

Exhibit JMB-28

July 18, 2000, Deposition Transcript of
Melaine Hardwick

CONDENSED TRANSCRIPT

STATE OF NORTH CAROLINA

UTILITIES COMMISSION
RALEIGH

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF THE
INTERCONNECTION AGREEMENT
NEGOTIATIONS BETWEEN AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC., TCG
OF THE CAROLINAS, INC., and
BELLSOUTH TELECOMMUNICATIONS,
INC., Pursuant to 47 U.S.C.
Section 252

Docket No. P-140, Sub 73
Docket No. P-646, Sub 7

DEPOSITION OF
MELAINE HARDWICK

July 18, 2000

2:11 p.m.

1200 Peachtree Street, N.E.

Atlanta, Georgia

Sharon A. Gabrielli, CCR-B-2002

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1 Deposition of Melaine Hardwick
 2 July 18, 2000
 3 MS. RULE: This is the deposition
 4 of Melaine Hardwick taken in docket number
 5 P-140, Sub 73 and P-646, Sub 17 in an
 6 arbitration before the North Carolina Public
 7 Service Commission.
 8 We may also have answers from
 9 Martha Lewis who will be deposed later on in
 10 the afternoon.
 11 Swear the witness, please.
 12 MARTHA LEWIS, having been first
 13 duly sworn, was deposed and testified as
 14 follows:
 15 EXAMINATION
 16 BY-MS.RULE:
 17 Q. My name is Marsha Rule. I'm an
 18 attorney for AT&T. And I would first like
 19 you to state your name and spell it for the
 20 court reporter and also state your business
 21 address.
 22 A. Okay. My name is Melaine, M E L
 23 A I N E, Hardwick, H A R D W I C K. My
 24 business address is 1277 Lenox Park
 25 Boulevard, Suite 300, Atlanta, Georgia.

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1 APPEARANCES OF COUNSEL
 2
 3 On behalf of AT&T:
 4 MARSHA RULE, ESQ.
 5 AT&T
 6 Suite 8100
 7 1200 Peachtree Street, N.E.
 8 Atlanta, Georgia 30309
 9
 10 On behalf BellSouth Telecommunications, Inc.:
 11 R. DOUGLAS LACKEY, ESQ.
 12 BellSouth Telecommunications, Inc.
 13 Suite 4300
 14 675 West Peachtree Street
 15 Atlanta, Georgia 30375-0747
 16
 17 Also Present:
 18 Martha Lewis
 19
 20
 21
 22
 23
 24
 25

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1 MS. RULE: And, Doug, could you
 2 state for the record the purposes for which
 3 Ms. Hardwick and Ms. Lewis have been
 4 produced?
 5 MR. LACKEY: Ms. Hardwick is here
 6 because y'all noticed her for a deposition.
 7 We offered her name in response to a
 8 question that asked for someone knowledgeable
 9 about BellSouth's internal change control
 10 processes.
 11 I explained to Mr. Lamoureux that
 12 Ms. Hardwick was familiar with the internal
 13 change control processes associated with ROS,
 14 which is our interface that BellSouth uses
 15 for its small business and large business
 16 services.
 17 In addition, we had a request for
 18 someone who could speak about the things that
 19 were contained in the deposition of the CIO
 20 of the small business group filed in the
 21 Louisiana 2-271 proceeding. We didn't have
 22 anyone who had that precise knowledge,
 23 particularly since those systems that were
 24 referenced in that affidavit are no longer
 25 used.

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<p>1 However, Ms. Lewis is 2 knowledgeable about ROS, which is the system 3 that we are using for small business today. 4 And we believe that she, in conjunction with 5 Ms. Hardwick, can probably respond to any 6 questions that would arise dealing with the 7 subject matters in that affidavit. 8 MS. RULE: Thank you. 9 Q. (By Ms. Rule) Ms. Hardwick, in 10 what part of BellSouth do you work? 11 A. I work for BellSouth business 12 systems. 13 Q. And what is BellSouth business 14 systems? 15 A. It is a part of large business 16 services. 17 Q. And what does BellSouth business 18 systems do? What functions does it take 19 care of? 20 A. Well, I could only speak to my 21 particular functions. There is a lot of 22 functions in BellSouth business systems. 23 Q. What are your functions? 24 A. I am the director for the ROS 25 application, manage it for both large</p>	<p>1 A. 24. 2 Q. And for whom do you work? 3 A. I work for Sherry Duncan. 4 Q. And what is her position? 5 A. Senior director. 6 Q. And what are the functions of the 7 people who work for you? 8 A. The functions of the -- of my 9 team, again, are to develop the requirements 10 for ROS changes or enhancements to the ROS 11 application, as well as user acceptance 12 testing for that application. 13 Q. Are you familiar with any of the 14 CLEC interfaces? 15 A. No, I'm not. 16 Q. Are you familiar with LENS? 17 A. No, I'm not. 18 Q. CGI? 19 A. No, I'm not. 20 Q. Do you have responsibilities for 21 any other systems or interfaces that 22 BellSouth uses? 23 A. Yes, I do. 24 Q. What are they? 25 A. I have responsibility for field</p>
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<p>1 business services as well as small business 2 services. 3 Q. What's the delineation between 4 large business services and small business 5 services? 6 A. Two different operating units of 7 the company. One that supports large 8 business versus small business. 9 Q. What counts as a large business 10 and what counts as a small business? 11 A. I don't know the answer to that 12 question. 13 Q. What are your specific job 14 responsibilities? 15 A. Management of the ROS application 16 for both, again, large business and small 17 business services. 18 Q. And in terms of management, what 19 tasks do you perform in order to manage the 20 interface? 21 A. I manage the group that is 22 responsible for developing the user 23 requirements, user acceptance testing for the 24 ROS application. 25 Q. How many people work for you?</p>	<p>1 support, for SOCS, RSAG, ATLAS. 2 Q. What is field support? 3 MR. LACKEY: I'm not sure she was 4 through with her answer. She may have been. 5 She just didn't look like it. 6 THE WITNESS: No. There are 7 more. SOCS, RSAG, ATLAS -- I think that's 8 it, actually. 9 Q. (By Ms. Rule) What is field 10 support? 11 A. That particular group supports 12 only large business, not small business, as 13 opposed to my ROS team supports both. And 14 if a user in the field has a question or an 15 issue regarding those applications, they would 16 contact this group. 17 Q. Do large users access any of 18 these systems directly, the SOCS, RSAG, or 19 ATLAS? 20 A. Yes, they do. 21 Q. Would a large business user come 22 to you or your group if, for example, they 23 identified improvements in RSAG that they 24 wished to have made? 25 A. Yes, they would.</p>

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1 Q. in addition to the
 2 responsibilities, your job responsibilities,
 3 are you familiar with any other BellSouth
 4 systems or interfaces that you don't directly
 5 work with?
 6 A. Yes.
 7 Q. Can you tell me what ones you're
 8 generally --
 9 A. There is another one that we do
 10 work with, too. It's BOCRIS.
 11 Q. What other systems are you
 12 familiar with?
 13 A. I'm a little familiar with DOE.
 14 I'm familiar with -- that would be about it,
 15 unless you can give me one by name.
 16 Q. RNS?
 17 A. No, I'm not familiar with RNS.
 18 Q. SONGS?
 19 A. No.
 20 Q. Have you read the testimony of
 21 any BellSouth witness in this docket?
 22 A. Yes, I have.
 23 Q. Whose testimony would that be?
 24 A. Ron Pate.
 25 Q. Have you read anybody else's

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1 testimony?
 2 A. Jay Bradbury.
 3 Q. Are you familiar with a BellSouth
 4 press release that discusses the selection of
 5 Telcordia as an OSS solutions provider?
 6 A. No, I'm not.
 7 Q. Are you familiar with the subject
 8 matter of the press release?
 9 A. No, I'm not.
 10 Q. Are you aware of any work that
 11 Telcordia is doing or would be doing that
 12 would affect your business unit?
 13 A. No.
 14 Q. Are you aware whether Telcordia
 15 has any work that will be done with or in
 16 connection with ROS?
 17 A. No. (Whereupon, a discussion
 18 ensued off the record.)
 19 Q. (By Ms. Rule) I'm going to ask
 20 you a series of questions, and I would like
 21 to ask you first to respond with regard to
 22 big business then with regard to small
 23 business. Is there any way you refer to
 24 those distinctions or is it big business or
 25 small business?

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1 A. That's how we refer to them.
 2 Q. How does the big business unit
 3 determine what it needs in the way of
 4 information technology generally?
 5 A. Could you -- I don't understand
 6 exactly the question. Could you rephrase
 7 that?
 8 Q. Certainly. How does big business
 9 identify a need for new types of information
 10 technology or improvements to the existing
 11 technology?
 12 A. Are you asking improvements to an
 13 existing application?
 14 Q. We can start there, certainly.
 15 A. Okay. Well, it's really the same
 16 for large business as it is for small
 17 business, in that a user generally of the
 18 application would submit a request to have
 19 something added or changed to -- specifically
 20 I'm speaking the ROS application.
 21 Q. Would that typically be something
 22 that the user had noticed that could be
 23 improved?
 24 A. Yes, it could be.
 25 Q. Who would that request be

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1 submitted to?
 2 A. It would be submitted to a
 3 representative either in small business or a
 4 representative in large business who actually
 5 is part of my staff for the large business
 6 side.
 7 Q. Would it be submitted to any
 8 representative or is there --
 9 A. There are two individuals that
 10 have responsibility for receiving the request.
 11 Q. What is their title?
 12 A. I can only speak to the person in
 13 my group, and her title is project manager.
 14 Q. After a request has been submitted
 15 to the project manager, what is the project
 16 manager's responsibility with regard to that
 17 request?
 18 A. She reviews the request to
 19 determine the value that it would add to the
 20 application. She also views it to see if
 21 it's a -- something that would be of benefit
 22 throughout the region.
 23 Q. How do people know where to -- or
 24 know that they should send the request to
 25 the project manager?

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<p>1 A. It's electronic -- it's a form 2 that is in a system that they can send, and 3 it's electronically sent to her via E-mail 4 address. 5 Q. How do they know to do that? Is 6 it part of their training? 7 A. Yes. It was covered in their ROS 8 training. 9 Q. Is there a document somewhere that 10 discusses what they should do when they 11 identify a possible improvement to the 12 system? 13 A. I don't believe there is a 14 document that was covered during the training 15 of the ROS deployment, but I don't believe 16 there is a document that addresses it. 17 Q. Is there a title or name for the 18 form that they fill out? 19 A. I believe it's called a ROS 20 enhancement form. 21 Q. Stepping back a bit, were you 22 involved in the development of ROS? 23 A. Yes, I was. 24 Q. What was your role in the 25 development of ROS?</p>	<p>1 Q. In order to effectuate that goal, 2 how were user requirements developed? 3 A. Well, we had user teams. 4 Q. How were the user teams made up? 5 A. They were made up with users that 6 we brought in from the field. 7 Q. And would those be service reps 8 who were using DOE and SONGS? 9 A. Correct. 10 Q. And what did the teams do? 11 A. The teams -- the teams were made 12 up with users as well as some managers as 13 well as IT folks to brainstorm, to develop 14 the requirements based upon the user needs, 15 and also to make sure we defined the goal of 16 being able to issue a service order with 17 this application. 18 Q. Were you involved in the process 19 of meeting with those teams in 1997? 20 A. Yes, at times. 21 Q. Who was in charge of that phase 22 of the project? 23 A. Kathy Dube was in charge at that 24 time. 25 Q. After you identified user</p>
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<p>1 A. Well, for part of the development 2 of ROS, I was a manager, managing the group 3 that developed the requirements, and then I 4 was promoted to my current position as 5 director during the development of ROS. 6 Q. How were user requirements 7 developed for ROS? 8 A. How were user requirements 9 developed? What methodology? I'm not 10 following the question. 11 Q. How long ago did development on 12 ROS begin? 13 A. We began development in 1997. 14 Q. What was the impetus for 15 developing ROS in 1997? 16 A. We were looking for an application 17 that would give both small business and large 18 business a single platform and would provide 19 them with regional service order capability. 20 Q. Was that, then, the starting point 21 for development, the goal of ROS, single 22 platform with regional service ordering 23 capability? 24 A. Yes, that was -- that was the 25 goal of ROS.</p>	<p>1 requirements, what was the next step? 2 A. After the user requirements were 3 developed, then we progressed through the 4 normal software delivery cycle of design, 5 construction, testing, implementation. 6 Q. Who actually did that part of the 7 work? 8 A. Andersen Consulting. 9 Q. When Andersen Consulting had 10 developed, I imagine, a prototype, what 11 happened next? 12 A. We did not have a prototype of 13 ROS. 14 Q. What did Andersen Consulting 15 produce with ROS? What was the first work 16 product? 17 A. We produced the ROS application, I 18 mean, over the period of time from 19 development of the requirements going through 20 your normal software cycle until we were 21 ready to deploy the application. 22 Q. Could you describe the normal 23 software cycle for me? 24 A. Yes. Planning and analysis which 25 is the phase that my folks were primarily</p>

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1 involved in with the requirements,
2 construction, design -- I'm sorry,
3 construction, implementation.
4 Q. At any stage of this process, was
5 a BETA version of ROS produced for testing?
6 A. When we got into the testing
7 phase, yes, there was a version of ROS where
8 my group was responsible for user acceptance
9 testing.
10 Q. So after the planning, analysis,
11 design, construction, what does implementation
12 consist of?
13 A. Actually deploying it to the users
14 of the application and training.
15 Q. Would that be the final version
16 or would that be a BETA version?
17 A. That was the final version.
18 Q. Where does -- I'm not clear where
19 in the process the testing comes in then.
20 A. The testing would be in
21 construction, I believe.
22 Q. Who was the system tested on
23 during the construction process?
24 A. It wasn't -- we had a -- my team
25 actually was performing the testing. It

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1 wasn't tested on a real user.
2 Q. What sorts of functions would your
3 team perform in order to test the system?
4 A. We developed scenarios that would
5 depict service orders, and that is what is
6 used to test the application, to ensure that
7 it would meet also the requirements that we
8 had developed.
9 Q. How were the scenarios developed?
10 A. By the user acceptance team.
11 Q. If a user identifies a change,
12 let's say, to ROS, and that change order
13 would require a change to methods and
14 procedures, how do you coordinate the methods
15 and procedures changes?
16 A. How do we coordinate the methods
17 and procedures changes?
18 Q. How do you make sure the methods
19 and procedures are changed?
20 A. Well, once a -- if a ROS
21 enhancement was -- had gone through all the
22 process work, was now actually scheduled for
23 a release, then we would develop the
24 requirements to support that change and it
25 would become part of the baseline ROS

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1 requirements.
2 Q. And that's a function of your
3 group?
4 A. Yes.
5 Q. When a user submits a change
6 request, who decides whether that change gets
7 implemented?
8 A. Well, the user would submit a --
9 we'll call the enhancement request. And
10 again, it gets evaluated by -- if it's large
11 business, it gets evaluated by my project
12 manager to determine if it will add value to
13 the business. If she feels that it will,
14 then she completes a work request, which goes
15 into the pipeline of just working pending
16 features for ROS.
17 Q. And what criteria does she use to
18 determine whether it will enhance ROS?
19 A. Again, based upon whether it's
20 going to have -- be a change that will be
21 supportive region-wide and just using her
22 good judgment based upon her knowledge of the
23 application.
24 Q. Can you give me examples of such
25 change requests that have been reviewed and

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1 approved?
2 A. Yes. They may want a -- I mean,
3 it could be a new folder, or a window, GUI,
4 in ROS, down to a pop-up button. It could
5 be a new edit. There are large changes and
6 then small changes, so they could vary.
7 Q. And you said if your manager then
8 decides it's a change that should be made,
9 to whom does she submit the change?
10 A. She completes a work request,
11 which further defines what the change is.
12 It goes on the working list of ROS features
13 and is discussed and prioritized by the ROS
14 governance board.
15 Q. Who is the ROS governance board?
16 A. The ROS governance board has
17 membership from both small business, large
18 business, and Andersen Consulting.
19 Q. How are members chosen for the
20 ROS governance board?
21 A. There is just a representative
22 that it's their primary -- it's the same two
23 people that enhancements come to that sit on
24 this board. It's their job responsibility.
25 Q. How many members are there on the

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<p>1 board?</p> <p>2 A. I would say between eight and</p> <p>3 ten.</p> <p>4 Q. How do they prioritize changes to</p> <p>5 ROS?</p> <p>6 A. Again, based upon the value that</p> <p>7 it's going to add to the business, depending</p> <p>8 upon what the request is.</p> <p>9 Q. Okay. Can you explain to me what</p> <p>10 you mean by value? Is it convenience, ease</p> <p>11 of use? Must there be a cost savings?</p> <p>12 A. It doesn't necessarily have to be</p> <p>13 a cost savings, but is it going to be</p> <p>14 something that perhaps would generate revenue</p> <p>15 for BellSouth or is it going to be something</p> <p>16 for a more efficient way to do it in ROS.</p> <p>17 Sometimes there are mandates.</p> <p>18 Q. Could you give me an example of a</p> <p>19 mandate?</p> <p>20 A. A disclosure statement that a user</p> <p>21 may have to provide to a customer.</p> <p>22 Q. If something is mandated, what</p> <p>23 does that mean for the prioritization</p> <p>24 process?</p> <p>25 A. It would get prioritized along</p>	<p>1 release that they are selecting features for</p> <p>2 would have what I call even higher priority</p> <p>3 because they are -- they are then submitted</p> <p>4 to Andersen for an estimate at that point.</p> <p>5 Q. Okay. And you said that they are</p> <p>6 voted on to be considered? Who then</p> <p>7 considers it after the board votes?</p> <p>8 A. We submit them to Andersen for</p> <p>9 estimates. And then when the estimates come</p> <p>10 back, it goes back to the board for the</p> <p>11 final decision. Based upon the estimate, we</p> <p>12 have only a certain amount of funding</p> <p>13 capacity.</p> <p>14 So depending upon if something</p> <p>15 comes back that is larger than can be fit</p> <p>16 into what I'll call a minor release -- and</p> <p>17 actually, I probably should have said that</p> <p>18 earlier. The governance board prioritize</p> <p>19 only work that we consider as minor</p> <p>20 enhancement changes, not major.</p> <p>21 Q. Why is that?</p> <p>22 A. Because we have a funding capacity</p> <p>23 to support minor. And if it's a major</p> <p>24 change, then the business unit has to bring</p> <p>25 incremental dollars to the table.</p>
Page 22	Page 24
<p>1 with everything else. It may get a higher</p> <p>2 prioritization if it's a mandate, obviously.</p> <p>3 Q. I'm assuming from what you've</p> <p>4 described to me that at any given time there</p> <p>5 will be a queue of changes for ROS, some of</p> <p>6 which have been put at a high level of</p> <p>7 priority and some of which have been put at</p> <p>8 a low level; is that correct?</p> <p>9 A. There is -- yes, that would be</p> <p>10 correct. There is a whole list of working</p> <p>11 features. Some that are assigned either a</p> <p>12 high, medium, low priority, and then others</p> <p>13 that have been categorized and selected for a</p> <p>14 future release.</p> <p>15 Q. I'm not sure I understood what</p> <p>16 you just told me. If something has a high</p> <p>17 priority, does it still wait in the queue?</p> <p>18 A. Yes. It still waits in the</p> <p>19 queue, but the items -- the governance board,</p> <p>20 when they meet, they review the list of</p> <p>21 pending features, high, medium, and low, and</p> <p>22 vote on which ones they would like to be</p> <p>23 considered as candidates for a pending ROS</p> <p>24 release. And so the ones that are selected</p> <p>25 as potential candidates for perhaps the next</p>	<p>1 Q. Let's assume that a user has</p> <p>2 identified something that the board believes</p> <p>3 would be helpful, a helpful enhancement but</p> <p>4 would require major programming expense. How</p> <p>5 is that handled by the board?</p> <p>6 A. That then would be -- instead of</p> <p>7 a work request being submitted, a document</p> <p>8 which would be considered a high-level</p> <p>9 requirement would have to be done on a major</p> <p>10 request. And those high-level requirements</p> <p>11 then are submitted to, again, Andersen to get</p> <p>12 the estimate.</p> <p>13 Q. And what happens to the estimate</p> <p>14 when it's produced by Andersen?</p> <p>15 A. It is then presented back to the</p> <p>16 user for either acceptance or rejection.</p> <p>17 Q. So basically they have to decide</p> <p>18 if they want to fund that or not?</p> <p>19 A. Yes.</p> <p>20 Q. Now, you mentioned that you have</p> <p>21 money or your business unit has money that</p> <p>22 supports what you called minor changes to</p> <p>23 ROS, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Is your business unit in</p>

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<p style="text-align: right;">Page 25</p> <p>1 competition for information technology resources in dollars?</p> <p>2 A. The Andersen folks that work for 3 us -- again we have for type -- what we 4 call type 2, which is minor, we have a 5 funding capacity that was set at the 6 beginning of this year. So we have Andersen 7 resources that are dedicated to ROS based on 8 that capacity. So I would say no, I'm not 9 competing with anyone else.</p> <p>10 Q. So with the aim of taking care of 11 the type 2 changes, you have a budget --</p> <p>12 A. Right.</p> <p>13 Q. -- and you generally work within 14 the budget by prioritizing requests?</p> <p>15 A. That's correct.</p> <p>16 Q. Can you describe the other types 17 of changes besides type 2?</p> <p>18 A. We have the major changes, major 19 requests that is a type 3. And then we 20 have type 1 work, which is considered 21 defects. We would call broke/fix changes.</p> <p>22 Q. Pardon me?</p> <p>23 A. Broke/fix.</p> <p>24 Q. If I understand you correctly,</p> <p>25</p>	<p style="text-align: right;">Page 27</p> <p>1 recess.)</p> <p>2 Q. (By Ms. Rule) What's the cycle 3 time for correcting -- what is the cycle 4 time for making a minor change that has been 5 approved by the board?</p> <p>6 A. Once the change is approved, final 7 approval. This is after it has gone to 8 Andersen, come back for an estimate, it's a 9 three-and-a-half month window before it's 10 delivered to the field.</p> <p>11 Q. When that change is going to be, 12 as you said, delivered to the field, what 13 notice do your users have of the impending 14 change?</p> <p>15 A. We actually send it the day or a 16 couple days before the release. We send out 17 what we call as release notes. It's about a 18 30-minute, usually, communication package 19 telling them about the changes.</p> <p>20 Q. So if I am a user of ROS, part 21 of my regular duties would be to check for 22 release notes. When I receive them, I would 23 review them. And was there any other 24 training provided in whatever the change is?</p> <p>25 A. Not for our minor enhancements.</p>
<p style="text-align: right;">Page 26</p> <p>1 your business unit has funds and prioritizes 2 changes of the type 2. Type 3, you will 3 work up basically an estimate from Andersen, 4 present to the business unit.</p> <p>5 A. Correct.</p> <p>6 Q. What happens with type 1? How 7 are those types of changes handled?</p> <p>8 A. From a budget perspective?</p> <p>9 Q. Let's say a user identifies -- or 10 requests a change that falls into the type 1 11 category. What happens to that change 12 request?</p> <p>13 A. Okay. Type 1 is a defect where 14 the system is not performing based upon the 15 way the requirements have it documented. 16 Something is broken. So a user would report 17 it, and that would go to Andersen. My user 18 team would actually test it to attempt to 19 recreate it.</p> <p>20 They would have to recreate the 21 problem before we could give it to Andersen. 22 If we are able to recreate it, then it goes 23 into the working defects that Andersen again 24 will do analysis on and resolution.</p> <p>25 (Whereupon, there was a brief</p>	<p style="text-align: right;">Page 28</p> <p>1 There's materials on file for them if they 2 wanted to review it later, but typically they 3 review the release notes and that is their 4 form of training.</p> <p>5 Q. The users who would be using ROS 6 don't have to make changes to any other 7 systems in order to utilize the change, do 8 they?</p> <p>9 A. Could you repeat that question?</p> <p>10 Q. Maybe I could do it more clearly. 11 If I'm a ROS user and I receive notice that 12 there is an enhancement coming out, I studied 13 the release notes, I am then fully prepared 14 to use the enhanced system, am I not?</p> <p>15 A. You should be.</p> <p>16 Q. Are there any other systems that 17 I would be working with that I would be 18 required to change or modify in order to 19 take advantage of the enhancement?</p> <p>20 A. No.</p> <p>21 Q. You also spoke briefly about 22 correction of a defect. And you talk about 23 the process for changing -- or for correcting 24 the defect. Does the ROS enhancement form 25 have a place on it to identify defects that</p>

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<p>1 need to be changed?</p> <p>2 A. No. The ROS enhancement form is</p> <p>3 to enhance the application. It is not used</p> <p>4 for defect.</p> <p>5 Q. How are defect requests</p> <p>6 communicated?</p> <p>7 A. A defect, a software defect is</p> <p>8 typically called in to either someone on my</p> <p>9 team or it could be called in to the TSC.</p> <p>10 Q. To the what?</p> <p>11 A. It's a group that again is</p> <p>12 outsourced, EDS supports it, but it's where</p> <p>13 all troubles on applications go.</p> <p>14 Q. And what was the name of it</p> <p>15 again?</p> <p>16 A. TSC.</p> <p>17 Q. Do you know what that stands for?</p> <p>18 A. No. I think it's technical</p> <p>19 support center, but I could be wrong.</p> <p>20 Q. Is that a BellSouth unit?</p> <p>21 A. No, it is not. EDS.</p> <p>22 Q. Can you give me an example of a</p> <p>23 defect that might be called in about ROS?</p> <p>24 A. Something, again, is not working</p> <p>25 the way it typically was performing or it</p>	<p>1 correctly according to the baseline document</p> <p>2 but works in a manner that was unexpected or</p> <p>3 produces a response that is not in accordance</p> <p>4 with the user's documentation. How is that</p> <p>5 classified?</p> <p>6 A. The user doesn't have any ROS</p> <p>7 documentation, so I don't understand that</p> <p>8 question.</p> <p>9 Q. I believe you said the user has</p> <p>10 on-line help available.</p> <p>11 A. They have -- they do -- I don't</p> <p>12 remember saying that, but they do have</p> <p>13 on-line help available.</p> <p>14 Q. Let's assume that the on-line help</p> <p>15 says you should be able to perform a</p> <p>16 particular function by following a series of</p> <p>17 steps. You follow the steps exactly as the</p> <p>18 on-line help says and it will not perform</p> <p>19 that function, is that a defect?</p> <p>20 A. No, that would not be a defect.</p> <p>21 Q. What would it be classified as?</p> <p>22 A. It could be that the on-line help</p> <p>23 is documented incorrectly, but because we</p> <p>24 work with Andersen, it is strictly either</p> <p>25 documented in our requirements -- and that's</p>
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<p>1 could be that they have actually -- what we</p> <p>2 call CORDOM'ed, where they actually lost</p> <p>3 their order when they went to issue it.</p> <p>4 Q. So if a system was working one</p> <p>5 day and then ceased working in that same</p> <p>6 fashion, that would be a defect?</p> <p>7 A. That's correct.</p> <p>8 Q. Would it also be a defect if the</p> <p>9 system did not work the way it was supposed</p> <p>10 to work, if it did not work the way the</p> <p>11 documentation described that it should work?</p> <p>12 A. Right. If it is not performing</p> <p>13 the way it is documented, then it is a</p> <p>14 defect. If it is performing the way it is</p> <p>15 documented, then that would be an enhancement</p> <p>16 to change it.</p> <p>17 Q. The document that the user uses</p> <p>18 or the document that it was programmed by,</p> <p>19 which document are we talking about?</p> <p>20 A. The document that the requirements</p> <p>21 that my team develops, the baseline</p> <p>22 documents, the baseline requirements document</p> <p>23 that ROS was coded to is the document that</p> <p>24 I'm referring to.</p> <p>25 Q. Let's suppose it was coded</p>	<p>1 the way the system performs. If it's not</p> <p>2 documented there, then it's a feature and not</p> <p>3 a defect.</p> <p>4 Q. When you say it's a feature and</p> <p>5 not a defect, do you mean that it would be</p> <p>6 classified as a type 2 change and not a type</p> <p>7 1 change?</p> <p>8 A. It would be classified as a</p> <p>9 feature and not a type 1, but until we get</p> <p>10 the estimate back, we don't know if it's</p> <p>11 type 2 or type 3.</p> <p>12 Q. I see. What is the cycle time</p> <p>13 for correction of a programming defect?</p> <p>14 A. Once the defect is identified, it</p> <p>15 is assigned to an Andersen programmer for</p> <p>16 analysis and there is no set time because it</p> <p>17 would depend upon if it's a small defect or</p> <p>18 something major, so it really would depend</p> <p>19 upon what piece of the application is broken.</p> <p>20 Q. Is there a classification system</p> <p>21 for describing defects?</p> <p>22 A. Yes, there is.</p> <p>23 Q. What is that?</p> <p>24 A. We classify defects as priorities</p> <p>25 1, 2, 3, or 4.</p>

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1 Q. And what do the priority levels
2 relate to?
3 A. Priority 1 is the most severe.
4 And it is a loss of data where they, as I
5 explained earlier, they may actually lose
6 their order. Priority 2 is a loss of
7 functionality where you have no work-around.
8 And a priority 3 is a loss of functionality
9 with a work-around. And a priority 4 is
10 typically more cosmetic, and that is the
11 lowest priority.
12 Q. Are there any goals for resolution
13 of each particular kind -- for timely
14 resolution of each particular kind of
15 priority?
16 A. We don't have any timelines
17 associated with the defects. Again, our
18 expectation would be that Andersen do the
19 analysis and determine a solution based upon
20 the priority of it, but there are no time
21 lines associated with it. Again, it depends
22 upon is it a small defect or a large defect.
23 Q. I believe you said the cycle time
24 for enhancements would be approximately
25 three-and-a-half months. Can you give me an

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1 approximate time for resolution of a priority
2 1 defect?
3 A. Yes. This would be the cycle
4 time for any defect that is resolved. We
5 have a production code freeze date,
6 approximately 21 days prior to our monthly
7 releases. So the best case scenario would
8 be if a defect had come in, had been
9 analyzed and resolved by Andersen and
10 actually was integrated into the software,
11 the solution. The best case scenario would
12 be if that was done 21 days prior to our
13 next release, that would be the soonest that
14 the field would get the solution. And
15 again, that is best case scenario.
16 Q. And you have monthly releases?
17 A. Yes, we do. Let me just explain.
18 The monthly release has a three-and-a-half
19 month window of software development.
20 Q. So if you start on day 1 of the
21 three-and-a-half-month development cycle, you
22 can get all the way through or up to the
23 last month. And as long as you get in a
24 defect request within 21 days you can
25 generally incorporate it in that release; is

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1 that correct?
2 A. Let me try to restate the
3 question the way I understood it. For our
4 August release, you would have to -- if our
5 August release was, hypothetical date, August
6 10th, you would have to have a defect 21
7 days prior to August the 10th, totally
8 received from the field, analyzed and solved
9 by Andersen. And again, defects can take
10 hours to resolve or days to resolve or
11 months to resolve depending upon the
12 complexity. So that would be, again, the
13 best case scenario.
14 Q. Taking you back to the priority 2
15 defect, that was the loss of function with a
16 work-around, correct?
17 A. No, that would be the loss of
18 functionality with no work-around.
19 Q. No work-around. And which one
20 was the number -- was it --
21 A. 3.
22 Q. 3?
23 A. Was a loss of functionality with
24 work-around.
25 Q. How is the work-around developed?

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1 A. A work-around is not really
2 developed at all. A work-around simply
3 implies to us that the user has another way
4 of doing it, perhaps manually typing it as
5 opposed to point and click.
6 Q. When the user identifies a defect,
7 is it the user's job to also identify
8 whether there is a work-around?
9 A. They would generally do that, yes.
10 We don't provide them with the work-around.
11 The only time we would communicate anything
12 to them is if we wanted them to not -- if
13 we had a GUI that perhaps was causing a
14 problem, we might send a message out and
15 tell them not to click on this button. But
16 typically their work-around is always -- and
17 the users know this -- revert to manually
18 typing it in ROS. Still using ROS but they
19 manually type it instead of point and click.
20 MS. RULE: Off the record.
21 (Whereupon, a discussion ensued
22 off the record.)
23 Q. (By Ms. Rule) So if I understand
24 you correctly, then, the defect is identified
25 by the users as having or not having a

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<p style="text-align: right;">Page 37</p> <p>1 work-around; is that correct?</p> <p>2 A. The user would report a defect.</p> <p>3 It would not be typical for a user to ask</p> <p>4 us for a work-around. It's common knowledge</p> <p>5 that if something is not working, then they</p> <p>6 revert to manually -- manual input.</p> <p>7 Q. When the user notifies you, is it</p> <p>8 the user's responsibility to say we don't</p> <p>9 have a work-around for this?</p> <p>10 A. No. It's not their</p> <p>11 responsibility. Again, it's just something</p> <p>12 that would be a no-brainer, if you will, for</p> <p>13 them. They just revert to manually typing</p> <p>14 it in ROS.</p> <p>15 Q. At what point, then, is a defect</p> <p>16 categorized as either 2 or 3?</p> <p>17 A. It is not categorized by the</p> <p>18 user. It is categorized by Andersen</p> <p>19 Consulting.</p> <p>20 Q. Can you tell me whether you know</p> <p>21 if ROS is meeting the expectations of big</p> <p>22 business and small business? Perhaps if I</p> <p>23 can clarify.</p> <p>24 A. Yes.</p> <p>25 Q. I believe you said there are two</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. Will it be initiated again next</p> <p>2 year?</p> <p>3 A. I don't know at this time.</p> <p>4 Q. Was this done in connection with</p> <p>5 the initial deployment of ROS?</p> <p>6 A. No. It was something that we did</p> <p>7 after the initial deployment of ROS to</p> <p>8 reinforce the training.</p> <p>9 Q. And my understanding is that ROS</p> <p>10 was developed to replace DOE and SONGS,</p> <p>11 correct?</p> <p>12 A. That's correct.</p> <p>13 Q. But it was not supposed to</p> <p>14 replace RNS?</p> <p>15 A. No.</p> <p>16 Q. Why is that?</p> <p>17 A. I don't know the answer to that.</p> <p>18 Q. Are you familiar with the LCSC?</p> <p>19 A. Only the term as you speak it.</p> <p>20 Q. Do you personally know of any</p> <p>21 reason why ROS could not be used in the LCSC</p> <p>22 in place of DOE and SONGS?</p> <p>23 A. No.</p> <p>24 Q. I would like to provide you with</p> <p>25 a copy of a document. And this is</p>
<p style="text-align: right;">Page 38</p> <p>1 main reasons that is ROS was developed.</p> <p>2 Have big business and small business users</p> <p>3 been satisfied that it has met those two</p> <p>4 criteria?</p> <p>5 A. It does provide them with a</p> <p>6 single platform, and it does provide them</p> <p>7 with regional ordering capability. So, yes,</p> <p>8 based on that criteria, I would say we have</p> <p>9 met their expectation.</p> <p>10 Q. Do you receive any other feedback</p> <p>11 other than change requests or defect</p> <p>12 notifications from users?</p> <p>13 A. Yes, we receive feedback from the</p> <p>14 field as we visit the field.</p> <p>15 Q. What is the process by which that</p> <p>16 input is gathered?</p> <p>17 A. Well, we perform coaching sessions</p> <p>18 where we go visit an office and coach them.</p> <p>19 We have occasionally focus groups when we</p> <p>20 visit an office just to get feedback from</p> <p>21 the users.</p> <p>22 Q. Is this a regular process?</p> <p>23 A. It's something that we've been</p> <p>24 doing this year, but we are about to wrap it</p> <p>25 up for this year, so --</p>	<p style="text-align: right;">Page 40</p> <p>1 BellSouth's response to AT&T's interrogatory</p> <p>2 number 8. And if you'll take a look at the</p> <p>3 table at the bottom of page 1. I would</p> <p>4 like you to take a minute at just look at</p> <p>5 it, but it's a list of ROS capabilities and</p> <p>6 I would like you to help me understand what</p> <p>7 they are.</p> <p>8 A. Okay.</p> <p>9 Q. And it continues over to the next</p> <p>10 page. Over on the second page, it's about</p> <p>11 two-thirds of the way down under the</p> <p>12 capability column, it says shortcut commands</p> <p>13 to minimize typing. Can you describe what</p> <p>14 shortcut commands to minimize typing are?</p> <p>15 A. Shortcut commands would be a</p> <p>16 command that you would enter. And I am not</p> <p>17 speaking -- let me just clarify, I cannot</p> <p>18 speak to RNS or SONGS but in DOE there were</p> <p>19 shortcut commands that you would enter and it</p> <p>20 would prepopulate some data for the user, so</p> <p>21 it would minimize typing.</p> <p>22 In ROS, we don't have commands</p> <p>23 because we are point and click, but the</p> <p>24 point and click capability again prepopulates</p> <p>25 data and so thereby minimizing typing.</p>

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1 Q. If you look at the DOE and ROS
 2 columns under shortcut commands, under DOE it
 3 says there are many, and under ROS it says
 4 yes. Can you tell me whether ROS has point
 5 and click shortcuts that DOE does not have
 6 shortcut commands for? I understand there is
 7 a different process, but are there also
 8 different functions?
 9 A. I don't know the answer to that.
 10 Q. Skipping down two rows under
 11 capability, it says cancel reissue. Can you
 12 explain what that is?
 13 A. Yes. That is a -- the ability
 14 to what we call internally cancel and reissue
 15 an order. So it's the same order with a
 16 new order number. And it's not a manual
 17 cancel reissue, is the best way I could
 18 explain it. And we do not have that in ROS
 19 -- okay. We don't have that function in ROS
 20 but they did in DOE.
 21 Q. How is this handled instead of
 22 the way it was handled in DOE?
 23 A. A user would have to go straight
 24 into SOCS to perform that function.
 25 Q. When you say that under cancel

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1 and reissue the user goes straight into SOCS,
 2 does that mean you're basically changing or
 3 amending that particular order instead of
 4 cancelling it out and starting a new one?
 5 A. Cancel reissue is typically only
 6 used when very few sections of the service
 7 order are changing. One example might be a
 8 service address where the customer is now not
 9 moving to this location, so it's moving over
 10 here to a separate location. That order,
 11 everything else may be the same but the
 12 address, and so SOCS cancels it internally
 13 and reissues it with the new information, and
 14 then SOCS switches it to the appropriate
 15 systems for that address. So it's not when
 16 a customer just cancels an order. It's an
 17 internal process to SOCS.
 18 Q. So when this chart indicates that
 19 ROS doesn't have that function, it means it's
 20 not in that interface, correct? That
 21 function does not reside in the ROS
 22 interface?
 23 A. That functionality does not reside
 24 in ROS.
 25 Q. But the user still has the

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1 ability to perform that function by going
 2 into SOCS?
 3 A. That's correct.
 4 Q. And going up to the top third or
 5 so of that same page, under capability, there
 6 is listed session manager.
 7 A. Um-hmm.
 8 Q. And it says that ROS has one.
 9 What is it?
 10 A. A session manager is a GUI in ROS
 11 that lists -- well, you can do multiple
 12 sessions in ROS. So you can start up to
 13 five orders in ROS and then iconify them.
 14 So the session manager just manages those
 15 sessions that you have open. It's a window
 16 that would list the sessions that you have
 17 open in ROS.
 18 Q. How does that appear to the user?
 19 A. It is just a window that provides
 20 them with the telephone number or order
 21 number that they have a session open in
 22 where they haven't issued the order.
 23 Q. So if the user is looking at the
 24 screen, it sounds like it appears like most
 25 Windows programs that are either minimized or

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1 active?
 2 A. Yes.
 3 Q. ROS relies on SOER edits, doesn't
 4 it?
 5 A. I'm sorry. I didn't hear the
 6 question.
 7 Q. ROS relies on SOER edits, doesn't
 8 it?
 9 A. We have SOER edits coded in ROS,
 10 but they are a component in ROS.
 11 Q. Are there edits in addition to
 12 the SOER edits coded into ROS?
 13 A. Yes.
 14 Q. Do you know the names and
 15 functions of those additional edits?
 16 A. We have some edits that are
 17 called OPEC, O P E C.
 18 Q. What does that stand for?
 19 MS. RULE: Off the record
 20 (Whereupon, a discussion ensued
 21 off the record.)
 22 MS. RULE: Okay. Back on the
 23 record.
 24 Q. (By Ms. Rule) Do you know what
 25 it stands for?

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1 A. I'm sorry, I do not.
2 Q. What is the function of the OPEC
3 edit?
4 A. OPEC edits are -- it's a function
5 that's performed actually in CRIS, on the
6 CRIS side of the house. And it is a matter
7 of when a customer would have perhaps
8 multiple pending service orders out there,
9 they may encounter an OPEC edit if one order
10 has a conflict based upon another order.
11 And we have a few of those in ROS; very
12 minimal, probably under ten at the most.
13 The majority of the edits that we have in
14 ROS are SOER.
15 Q. Do you mean there were fewer than
16 ten OPEC edits or there are ten --
17 A. Fewer than ten OPEC edits coded
18 in ROS.
19 Q. Are there other edits in addition
20 to the OPEC edits?
21 A. Primarily the edits that we have
22 in ROS are SOER edits.
23 Q. In North Carolina, BellSouth does
24 use ROS as a sales and marketing interface,
25 correct?

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1 A. They use ROS in small business
2 and large business only in North Carolina.
3 Q. Are there any circumstances in
4 which a BellSouth rep could make a complete
5 and accurate input into ROS for a BellSouth
6 retail service or product and that request
7 would fall out for manual processing and then
8 be routed to another BellSouth employee?
9 A. Can I ask you to explain, when
10 you're saying manual processing -- or perhaps
11 I can explain. If they issued an order,
12 they could encounter an error, a SOER error.
13 SOER errors are performed inside of ROS and
14 the user will then encounter SOER errors
15 again once the order is sent to SOCS. So
16 there could be an error on an order, and
17 that error would come back to the user.
18 Q. Okay. Let's assume that we have
19 an order that has no errors, that the user
20 accurately and completely submitted the order.
21 Are there circumstances under which it would
22 fall out of ROS and require some sort of
23 manual processing by that user or another
24 user?
25 A. No.

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1 Q. Do you know if there are any
2 BellSouth retail services or products that
3 can't be requested or ordered through the use
4 of ROS?
5 A. No. ROS will support all
6 products and services, not all by point and
7 click functionality but we have the ability,
8 again, for the user to manually enter in
9 service order format other products and
10 services in ROS.
11 Q. What products and services would
12 have to be manually entered?
13 A. Frame relay, ESSEX, CENTREX.
14 There are more. I'm not familiar with all
15 the products.
16 Q. Now when you say it has to be
17 manually entered, do they have to create an
18 entire manual -- does the user have to
19 create an entire manual order or is there a
20 field or fields on the point and click order
21 that is entered manually?
22 A. Well, again, ROS generates based
23 upon service order standard rules, so the
24 sections of a service order that are not
25 product-specific listing information or billing

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1 information, then the point and click
2 functionality in ROS would work for any
3 product. But when they get into what we
4 call the service and equipment section of the
5 order, which is specific to the product, then
6 they would have to manually type if it was a
7 product that was not supported.
8 Q. I would like to hand you a copy
9 of BellSouth's response to AT&T's
10 Interrogatory item number 3. We asked for
11 data regarding the number of BellSouth
12 employees in each BellSouth work center
13 analogous to CLEC work centers in another
14 question. And I would like you to take a
15 look at the data on the next page for a
16 moment. I'm sorry. I would like to direct
17 you to the last page.
18 Do you see on the next to the
19 last page the heading small business
20 non-management?
21 A. Yes, I do.
22 Q. If you look at the column that's
23 dated April '99, I hate to have to ask you
24 this, but would you agree, subject to check,
25 that that looks about 850 if you total that

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1 up?
2 A. Yes.
3 Q. Okay. And if you look over to
4 the right where there is a column March
5 2000 --
6 A. Okay.
7 Q. -- that looks like it adds up to
8 about 900, correct subject to check?
9 A. Probably, right.
10 Q. Okay. So it looks like, if I'm
11 understanding this, between the period April
12 '99 and March of 2000, small business
13 non-management head count grew, correct?
14 A. If that's what these numbers are,
15 that would appear that, yeah, it increased.
16 Q. Do you have any knowledge about
17 the head count in the small business centers?
18 A. No, I do not.
19 Q. Large business?
20 A. No, I do not.
21 MS. RULE: Off the record.
22 (Whereupon, a discussion ensued
23 off the record.)
24 Q. (By Ms. Rule) Now we are
25 providing you with a copy of BellSouth's

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1 response to AT&T's interrogatory number 69.
2 And I would like you to take a minute to
3 familiarize yourself with the question and
4 the response.
5 On page 2, item B, we asked for
6 the number and percentage of eligible
7 BellSouth retail business unit transactions
8 performed using ROS.
9 And the answer says that 1999
10 transactions are defined as orders issued
11 (all order types) and updates to existing
12 orders. Can you explain the difference
13 between an order issued and an update to an
14 existing order?
15 A. Yes. An order issued is the
16 initial negotiation in ROS. And then when
17 the order is issued, any subsequent changes
18 to that order is considered an update.
19 Q. So after an order is issued, it
20 becomes an existing order. And then activity
21 that takes place on that would be treated as
22 an update?
23 A. That's correct.
24 Q. How does ROS track the number of
25 orders issued and the number of updates to

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1 existing orders?
2 A. We have ROS reports that calculate
3 or track the data.
4 Q. Do the reports have -- are they
5 named?
6 A. They are called ROS reports.
7 Q. Is there more than one type of
8 report?
9 A. There is, but it's primarily the
10 same information. The reports just vary
11 based upon level. You may have a manager
12 report versus an assistant manager report
13 versus a service rep report.
14 Q. And would each level of report
15 reveal different information that was tracked?
16 A. No. It's the same information.
17 It really tracks the number of orders and
18 the number of updates.
19 Q. What information does it provide
20 regarding the orders and updates?
21 A. It provides the time that the
22 order started and the duration of the order
23 and the disposition of the order.
24 Q. Does ROS assign its own tracking
25 number to each transaction?

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1 A. ROS assigns a service order number
2 to each order that is issued.
3 Q. Is that different from the service
4 order number that's assigned in SOCS?
5 A. No, it would be the same number.
6 We actually -- the order number is actually
7 retrieved from SOCS by ROS and utilized.
8 Q. Can you tell me what conditions
9 cause the need for an update order or an
10 update to an existing order?
11 A. A customer may call and change
12 their mind about something, which would
13 initiate a change or it could be error
14 correction.
15 Q. How would the errors have been
16 identified?
17 A. The errors, if the service order
18 encountered a SOER error, then it's
19 identified on that service order with an
20 error indicator and the users have to --
21 it's part of the responsibility for them to
22 check for errors on the orders that they
23 issue.
24 Q. How do they do that?
25 A. They have to sign onto a -- or

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<p>1 open up a window in ROS that has reports 2 that has an error on it -- I mean, the 3 order would be on there if it had an error 4 on it. 5 Q. Is there a name for that report? 6 A. The window is called SOLE, S O L 7 E. 8 Q. What does that stand for? 9 A. Service order -- 10 MS. LEWIS: On-line -- 11 THE WITNESS: Errors, I believe, 12 but it's S O L E. 13 Q. (By Ms. Rule) Service order 14 on-line errors? 15 A. Yes. 16 Q. So you identified a customer 17 update, a customer call or an error 18 correction resulting from a SOER error as 19 being a cause of an update to an existing 20 order. Are there any other causes or 21 reasons to update an existing order? 22 A. It could be that the user didn't 23 complete the order initially but maybe they 24 went to lunch and they came back. When they 25 retrieve the order back, it's still</p>	<p>1 updated? 2 A. When you ask is there a 3 difference -- 4 Q. Are there more or less? 5 A. Oh, I don't know the answer to 6 that. 7 MS. RULE: Okay. Thank you. 8 EXAMINATION 9 BY-MR.LACKEY: 10 Q. Ms. Hardwick, Ms. Rule asked you 11 about the cycle times for defects and for 12 minor changes. I don't recall her asking 13 you for the second time for major changes. 14 Do you know what the average cycle time for 15 major changes to ROS are? 16 A. Yes. Again, I will tell you that 17 the cycle time would start at the time that 18 funding is secured and that the software 19 development cycle actually starts with 20 Andersen. We've experienced about a 9 to 21 12-month cycle time. 22 Q. All right. And Ms. Rule asked 23 you about using ROS in the LCSC. Do you 24 recall that? 25 A. Yes.</p>
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<p>1 considered an update. 2 Q. Of the three reasons you've 3 identified, which is the most frequent cause 4 for updating existing orders? 5 A. Error correction. 6 Q. Can you give me a rough 7 percentage of how many of the updates are 8 necessitated by error correction? 9 A. No, I cannot, because we do not 10 keep reports in ROS on error correction. 11 MS. RULE: Off the record. 12 (Whereupon, a discussion ensued 13 off the record.) 14 MS. RULE: Back on the record. 15 Q. (By Ms. Rule) It appears to us 16 from this interrogatory response that more 17 small business issued orders are updated than 18 big business issued orders are updated. Is 19 that your experience? 20 A. I don't know the answer to that 21 question. 22 Q. Do you know whether there is a 23 difference between the number of small 24 business orders that are updated and the 25 number of big business orders that are</p>	<p>1 Q. Can ROS process a UNE order? 2 A. No, it cannot. 3 Q. Can ROS process a resale order? 4 A. No, it cannot. 5 Q. Can ROS process a residential 6 order? 7 A. Yes. ROS can process a 8 residential order. And I probably should 9 back up and say resale, I'm not sure that 10 I'm clear enough on what a resale order 11 looks like to say yes or no on that one. 12 Q. But you're sure about the UNE 13 order? 14 A. I'm positive about the UNE order. 15 Q. Okay. You were also talking 16 about issued orders versus update orders. Do 17 you ever get a situation where after you've 18 taken an order you get a message back that 19 there is no facilities to handle the order? 20 A. Yes. 21 Q. Is that one of the things that 22 might cause an update or not? 23 A. Yes, that would cause an update, 24 could cause an update. 25 Q. When you issue a ROS order, do</p>

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<p>1 you know that the time that you've issued it</p> <p>2 whether there are facilities out there or not</p> <p>3 to fill the order?</p> <p>4 A. No, we do not.</p> <p>5 MR. LACKEY: That's all I have.</p> <p>6 (Deposition concluded at 3:45 p.m.)</p> <p>7 .</p> <p>8 .</p> <p>9 .</p> <p>10 .</p> <p>11 .</p> <p>12 .</p> <p>13 .</p> <p>14 .</p> <p>15 .</p> <p>16 .</p> <p>17 .</p> <p>18 .</p> <p>19 .</p> <p>20 .</p> <p>21 .</p> <p>22 .</p> <p>23 .</p> <p>24 .</p> <p>25 .</p>	<p>1 Disclosure Pursuant to O.C.G.A. 9-11-28</p> <p>2 (d):</p> <p>3 The party taking this deposition will</p> <p>4 receive the original and one copy based on</p> <p>5 our standard and customary per page charges.</p> <p>6 Copies to other parties will be furnished</p> <p>7 based on our standard and customary per page</p> <p>8 charges. Incidental direct expenses of</p> <p>9 production may be added to either party where</p> <p>10 applicable. Our customary appearance fee</p> <p>11 will be charged to the party taking this</p> <p>12 deposition.</p> <p>13</p> <p>14 SHARON A. GABRIELLI, CCR-B-2002</p> <p>15 .</p> <p>16 .</p> <p>17 .</p> <p>18 .</p> <p>19 .</p> <p>20 .</p> <p>21 .</p> <p>22 .</p> <p>23 .</p> <p>24 ..</p> <p>25 .</p>
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<p>1 STATE OF GEORGIA:</p> <p>2 COUNTY OF FULTON:</p> <p>3 I hereby certify that the foregoing</p> <p>4 transcript was reported, as stated in the</p> <p>5 caption, and the questions and answers</p> <p>6 thereto were reduced to typewriting under my</p> <p>7 direction; that the foregoing pages represent</p> <p>8 a true, complete, and correct transcript of</p> <p>9 the evidence given upon said hearing, and I</p> <p>10 further certify that I am not of kin or</p> <p>11 counsel to the parties in the case; am not</p> <p>12 in the employ of counsel for any of said</p> <p>13 parties; nor am I in anywise interested in</p> <p>14 the result of said case.</p> <p>15 .</p> <p>16 .</p> <p>17 .</p> <p>18 .</p> <p>19 .</p> <p>20 .</p> <p>21 .</p> <p>22 .</p> <p>23 .</p> <p>24 .</p> <p>25 .</p>	<p>1 CAPTION</p> <p>2 The Deposition of Melaine Hardwick,</p> <p>3 taken in the matter, on the date, and at the</p> <p>4 time and place set out on the title page</p> <p>5 hereof.</p> <p>6 It was requested that the deposition</p> <p>7 be taken by the reporter and that same be</p> <p>8 reduced to typewritten form.</p> <p>9 It was agreed by and between counsel</p> <p>10 and the parties that the Deponent will read</p> <p>11 and sign the transcript of said deposition.</p> <p>12 .</p> <p>13 .</p> <p>14 .</p> <p>15 .</p> <p>16 .</p> <p>17 .</p> <p>18 .</p> <p>19 .</p> <p>20 .</p> <p>21 .</p> <p>22 .</p> <p>23 .</p> <p>24 .</p> <p>25 .</p>

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<p>S 53:6,12 sales 45:24 same 11:15 20:22 30:5 41:15 42:11 43:5 51:10 51:16 52:5 60:7 62:14 satisfied 38:3 savings 21:11,13 saying 31:12 46:10 says 31:15,18 40:12 41:3 41:3,11 43:8 50:9 scenario 34:7,11,15 35:13 scenarios 18:4,9 scheduled 18:22 screen 43:24 second 40:10 55:13 section 1:9 48:4 sections 42:6 47:24 secured 55:18 see 12:20 32:12 48:18 selected 22:13,24 selecting 23:1 selection 10:4 send 12:24 13:2 27:15,16</p>			

<p>21:14,15,22 22:16 23:14 24:2 26:16 29:24 32:18 37:5,11 38:23 39:6 52:12 Sometimes 21:17 somewhere 13:9 SONGS 9:18 15:8 39:10 39:22 40:18 soonest 34:13 sorry 17:2 44:5 45:1 48:16 sort 46:22 sorts 18:2 sounds 43:24 SOUTHERN 1:7 speak 4:18 5:20 12:12 39:19 40:18 speaking 11:20 40:17 specific 6:13 48:5 specifically 11:19 spell 3:19 spoke 28:21 staff 12:5 stage 17:4 stand 44:18 53:8 standard 47:23 59:5,7 stands 29:17 44:25 start 11:14 34:20 43:12 55:17 started 51:22 starting 14:20 42:4 starts 55:19 state 1:1 3:19,20 4:2 58:1 61:2 stated 58:4 statement 21:20 states 1:7 61:6 step 16:1 Stepping 13:21 steps 31:17,17 still 22:17,18 36:18 42:25 53:25 straight 41:23 42:1 Street 1:16 2:7,14 strictly 31:24 studied 28:12 Sub 1:6,7 3:5,5 subject 5:7 10:7 48:24 49:8 submit 11:18 19:8 20:9 23:8 submits 19:5 submitted 12:1,2,7,14 23:3 24:7,11 46:20 SUBSCRIBED 61:15</p>	<p>subsequent 50:17 Suite 2:6,13 3:25 support 8:1,2,10 18:24 23:23 29:19 47:5 supported 48:7 supportive 19:21 supports 6:7 8:11,13 24:22 29:12 suppose 30:25 supposed 30:9 39:13 sure 8:3 15:15 18:18 22:15 56:9,12 Swear 3:11 switches 42:14 sworn 3:13 61:6,15 system 5:2 13:2,12 17:22 18:3 26:14 28:14 30:4,9 32:1,20 systems 4:23 5:12,14,18 5:22 7:21 8:18 9:4,11 28:7,16 42:15</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>table 23:25 40:3 take 5:18 28:19 35:9 40:2 40:4 48:14 50:2 taken 3:4 56:18 60:3,7 61:7 62:13 takes 50:21 taking 25:11 35:14 59:3 59:11 talk 28:22 talking 30:19 56:15 tasks 6:19 TCG 1:7 team 7:9 8:13 17:24 18:3 18:10 26:18 29:9 30:21 teams 15:3,4,10,11,11,19 technical 29:18 technology 11:4,10,11 25:1 Telcordia 10:5,11,14 telecommunications 1:8 2:10,12 telephone 43:20 tell 9:7 36:15 37:20 41:4 52:8 55:16 telling 27:19 ten 21:3 45:12,16,16,17 term 39:19 terms 6:18 test 18:3,6 26:18 tested 17:22 18:1 testified 3:13 testimony 9:20,23 10:1</p>	<p>testing 6:23 7:12 16:5 17:5,6,9,19,20,25 Thank 5:8 55:7 their 12:11 13:6,7 20:22 20:24 28:3 30:3 33:6 36:16 37:10 38:9 52:12 thereto 58:6 things 4:18 56:21 think 8:7 29:18 third 43:4 three 54:2 three-and-a-half 27:9 33:25 34:18 three-and-a-half-month 34:21 through 8:4 16:3,19 18:21 34:22 47:3 throughout 12:22 time 15:24 16:18 22:4 27:3,4 32:12,16 33:20 33:23 34:1,4 36:11 39:3 51:21 55:13,14,17,17 55:21 57:1 60:4 61:8 timelines 33:16 timely 33:13 times 15:20 55:11 title 12:11,13 13:17 60:4 61:9 today 5:3 told 22:16 top 43:4 total 48:25 totally 35:7 track 50:24 51:3 tracked 51:15 tracking 51:24 tracks 51:17 training 13:6,8,14 17:14 27:24 28:4 39:8 transaction 51:25 transactions 50:7,10 transcript 58:4,8 60:11 61:6,10 62:12,19 treated 50:21 troubles 29:13 true 58:8 61:10 try 35:2 TSC 29:9,16 two 6:6 12:9 20:22 37:25 38:3 41:10 two-thirds 40:11 type 25:4,5,12,18,20,21 26:2,2,6,10,13 32:6,6,9 32:11,11 36:19 48:6 51:7</p>	<p>types 11:9 25:17 26:7 50:11 typewriting 58:6 typewritten 60:8 typical 37:3 typically 11:21 28:2 29:8 29:25 33:10 36:16 42:5 typing 36:4,18 37:13 40:13,14,21,25</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>Um-hmm 43:7 under 40:11 41:2,2,3,10 41:25 43:5 45:12 46:21 58:6 understand 11:5 25:25 31:7 36:23 40:6 41:6 understanding 39:9 49:11 understood 22:15 35:3 UNE 56:1,12,14 unexpected 31:7 unit 10:12 11:2 23:24 24:21,25 26:1,4 29:20 50:7 units 6:6 unless 9:15 until 16:20 32:9 update 50:13,18,22 52:9 52:10 53:17,19,21 54:1 56:16,22,23,24 updated 54:17,18,24 55:1 updates 50:11,25 51:18 51:20 54:7 updating 54:4 use 19:17 21:11 28:14 45:24 46:1 47:3 used 4:25 18:6 29:3 39:21 42:6 user 6:22,23 7:11 8:14,21 11:17,22 14:6,8 15:2,3 15:4,14,25 16:2 17:8 18:1,10,11 19:5,8 21:20 24:1,16 26:9,16,17 27:20 28:11 30:17 31:6 31:9 36:3,6 37:2,3,7,18 40:20 41:23 42:1,25 43:18,23 46:14,17,19 46:23,24 47:8,18 53:22 users 8:17 15:5,12 17:13 27:13 28:5 36:17,25 38:2,12,21 52:20 user's 31:4 36:7 37:8 uses 4:14 7:22 30:17 using 5:3 15:8 19:21 28:5</p>
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<p>36:18 50:8 55:23 usually 27:18 UTILITIES 1:2,3 utilize 28:7 utilized 52:7 U.S.C 1:8</p>	<p>working 19:15-20:12 22:10 26:23 28:17 29:24 30:4,5 37:5 works 31:2 work-around 33:7,9 35:16,18,19,24,25 36:1 36:2,8,10,16 37:1,4,9 wrap 38:24 wrong 29:19</p>	<p>6 675 2:14 69 50:1</p>	
<p style="text-align: center;">V</p> <p>value 12:19 19:12 21:6,10 vary 20:6 51:10 version 17:5,7,15,16,17 versus 6:8 51:12,13 56:16 very 42:6 45:11 via 13:3 views 12:20 visit 38:14,18,20 vote 22:22 voted 23:6 votes 23:7</p>	<p style="text-align: center;">Y</p> <p>yeah 49:15 year 25:7 38:24,25 39:2 y'all 4:6</p>	<p>7 7 1:7 73 1:6 3:5</p>	
<p style="text-align: center;">W</p> <p>W 3:23 wait 22:17 waits 22:18 want 20:2 24:18 wanted 28:2 36:12 wasn't 17:24 18:1 way 10:23 11:3 21:16 26:15 29:25 30:9,10,13 30:14 32:1 34:22 35:3 36:3 40:11 41:17,22 well 5:20 6:1 7:11 11:15 14:1 15:3,12,13 18:20 19:8 38:17 43:11 47:22 went 30:3 53:24 were 4:19,23 13:21 14:6,8 14:16 15:2,4,5,8,11,18 16:2,20,25 18:9 40:18 45:15 56:15 58:6</p>	<p style="text-align: center;">1</p> <p>1 25:21 26:6,10,13 32:7,9 32:25 33:3 34:2,20 40:3 10th 35:6,7 1107 62:4 12-month 55:21 1200 1:16 2:7 1277 3:24 17 3:5 18 1:13 3:2 62:9 1997 14:13,15 15:19 1999 50:9</p>	<p>8 8 40:2 8100 2:6 850 48:25</p>	
<p>West 2:14 we'll 19:9 we've 38:23 55:20 whole 22:10 window 20:3 27:9 34:19 43:15,19 53:1,6 Windows 43:25 wished 8:24 witness 3:11 8:6 9:21 53:11 work 5:10,11 6:25 7:2,3,7 9:5,10 10:10,15 16:7,15 18:22 19:14 20:10 23:19 24:7 25:3,14,21 26:3 30:9,10,10,11 31:24 48:2,12,13</p>	<p style="text-align: center;">2</p> <p>2 25:5,12,18 26:2 32:6,11 32:25 33:6 35:14 37:16 50:5 2-271 4:21 2:11 1:14 2000 1:13 3:2 49:5,12 61:16 62:9 21 34:6,12,24 35:6 24 7:1 252 1:9</p>	<p>9 9 55:20 9-11-28 59:1 900 49:8 99 48:23 49:12</p>	
	<p style="text-align: center;">3</p> <p>3 25:20 26:2 32:11,25 33:8 35:21,22 37:16 48:10 3:45 57:6 30-minute 27:18 300 3:25 30309 2:8 30375-0747 2:15</p>		
	<p style="text-align: center;">4</p> <p>4 32:25 33:9 4300 2:13 47 1:8</p>		

Exhibit JMB-29

Correspondence Related to LCSC Overload

Bradbury, J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, October 20, 2000 12:43 PM
To: gpterry@att.com; bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com; campbekj@att.com; belangda@att.com; smorrow@broadband.att.com; dobeck@broadband.att.com; crcannon@att.com; watersre@att.com; bcsturdevant@att.com; deberger@att.com; waldbads@att.com
Subject: FW: Order Backlog
Importance: High

> -----Original Message-----

> From: Williamson, Jill R, NCAM
> Sent: Friday, October 20, 2000 12:30 PM
> To: 'Jan M. Burriss'
> Cc: 'Sandra C. Jones'
> Subject: Order Backlog
> Importance: High

> Jan,

> I've received calls from several of our workcenters this week around an
> apparent backlog of orders at the LCSC. I spoke with Sandra earlier this
> week and found that the LCSC is backlogged due to the addition of the
> Broadband orders in the Atlanta LCSC.

> We have orders that were sent a week ago that have yet to receive a
> response. When we call the LCSC to get the orders turned around, they
> will only accept two PONs per call. Thus our workcenter must spend a
> great deal of time calling the LCSC just to get a response on the orders.

> I called Ron Moore today to request that he accept a list of the PONS to
> be worked instead of us calling back two PONS at a time (Broadband has 36
> orders backlogged). I'm waiting on Ron's response. Additionally, I don't
> understand why BellSouth is having this problem when it knew the volume of
> orders it would be transitioning from Birmingham to Atlanta. I'd
> appreciate your providing me with a plan to remedy the current backlog and
> BellSouth's plan to correct the issue going forward. I'd appreciate a
> response by close of business today.

> Sincerely,

> Jill Williamson

Bradbury, J M (Jay) - LGA

From: jwilliamson@att.com
Sent: Monday, November 06, 2000 12:58 PM
To: mlacy@att.com; bseigler@att.com; gpterry@att.com; eppsteiner@att.com; sharonnorris@att.com; bradbury@att.com; bobik@att.com; dreinig@att.com; deberger@att.com; watersre@att.com; dobeck@broadband.att.com; smorrow@broadband.att.com; waldbads@att.com; campbekj@att.com; crcannon@att.com
Subject: FW: LCSC backlog

-----Original Message-----

From: Jan.Flint@bridge.bellsouth.com
[mailto:Jan.Flint@bridge.bellsouth.com]
Sent: Friday, November 03, 2000 3:27 PM
To: Williamson, Jill R, NCAM
Cc: Jan.Burriss1@bridge.bellsouth.com;
Sandra.Jones5@bridge.bellsouth.com
Subject: LCSC backlog

Jill,

I wrote this on Monday and thought I sent it to you but I just found it in my out box -- sorry.

I talked to Ron Moore today about the FOC backlog that AT&T has experienced in the last two weeks.

Ron attributed the MediaOne fall-out and backlog to a directory listings problem in our LEO system. There was also a problem with inappropriate usage of commas in MediaOne's LSRs that caused additional orders to fall-out for manual handling. The LCSC could not easily handle the large number of orders that required manual handling.

This past week, order volume overwhelmed the center. After working this past Saturday, Ron feels that by close of business today they will have recovered and will be current on their pending LSRs.

To address the order volume issues, the LCSC will add 20 service reps to its staff on November 13th and will add another 20 in December.

I hope this information minimizes AT&T's concerns on recent FOC cycle-time.

Thanks,

Jan

Exhibit JMB-30

Order Tracking Change Request CR0040



Change Request Form

Internal Reference # _____ (1) Date Change Request Submitted 5/11/00(2)

TYPE 5 (CLEC) TYPE 4 (BST) TYPE 3 (INDUSTRY) TYPE 2 (REGULATORY) (3)

TYPE 6 (DEFECT) (3A)

Company Name AT&T _____ (4)

CCM Jill Williamson _____ (5) Phone 404-810-8562 _____ (6)

CCM Email Address jwilliamson@att.com _____ (7) Fax 404-810-8605 _____ (8)

Alternate CCM _____ (9) Alt Phone # _____ (10)

Originator's Name Jill Williamson _____ (11) Phone 404-810-8562 _____ (12)

Title of Change Order Tracking Request _____ (13)

Category Add New Functionality Change Existing (14) Desired Due Date 7/1/00 (15)

Originating CCM assessment of impact Major Minor None expected (16)

Originating CCM assessment of priority Urgent High Medium Low (17)

Interfaces Impacted (18)			
<input type="checkbox"/> Pre-Ordering <input type="checkbox"/> LENS <input type="checkbox"/> TAG <input type="checkbox"/> CSOTS	<input checked="" type="checkbox"/> Ordering <input checked="" type="checkbox"/> EDI <input checked="" type="checkbox"/> LNP <input checked="" type="checkbox"/> LENS <input checked="" type="checkbox"/> TAG	<input type="checkbox"/> Maintenance <input type="checkbox"/> TAPI <input type="checkbox"/> EC-TA Local	<input type="checkbox"/> Manual

Type Of Change - Check one or more, as applicable (19)			
<input type="checkbox"/> Software <input type="checkbox"/> Product & Services <input type="checkbox"/> Documentation	<input type="checkbox"/> Hardware <input type="checkbox"/> New or Revised Edits <input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards <input type="checkbox"/> Process <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Defect

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

This request is to add functionality, similar to that provided by CSOTS, to track PONS/orders from the time the order hits BellSouth's gateway until the order is completed. This order tracking tool should be available electronically and should be centralized into a single source for CLECs to access. This tool will allow CLECs to track orders from the point of origination to order completion, minimizing the need for phone calls and inquiries between workcenters. **In today's environment, reps call to either gain clarification on an order, gain status of an order or to find out why a response hasn't been received. An order tracking system would allow CLECs to follow an order within BellSouth from the time it hits BellSouth's gateway until the order is completed with minimal disruption to the workcenters. Some examples of information that could be obtained would be the receipt and transmittal times from EDI to LEO to LESOG to SOCS and LNP to LAUTO to SOCS, status of the order, i.e, fell out of system, reason for fallout, time posted to worklist, time claimed by rep., time re-submitted by rep., etc. An additional function may be to allow the CLEC to issue a "trouble ticket" when a**

Attachment A-1



Change Request Form

reject/clarification is received in error or when a clarification is unclear. BellSouth could then assign a ticket number and respond to the CLECs trouble ticket. The attached diagram depicts the flow of information from BellSouth's systems into the proposed order tracker.

Known dependencies (21)

Additional information Yes No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

This Section to be completed by BCCM only.

Change Request Log # CR0040 (23) Clarification Yes No (24)

Clarification Request Sent 06/02/00 (25) Clarification Response Due 06/13/00 (26)

Status RC (27)

Change Request Review Date 06/28/00 / 4/25/01 (28) Target Implementation Date _____ (29)

Last Modified By BCCM (30) Date Modified 4/30/01 (31)

Defect Validation Results: (32)

Change Review Meeting Results (33)

3-15-01 Non-scheduled change request. Request to be re-prioritized at 3/28/01 meeting.

4-30-01 CR prioritized on 4-25-01. Refer to "Release Prioritization Ranking" on CCP Web site.

Canceled Change Request Duplicate Training Clarification Not Received

Cancellation by BellSouth (34)

Cancellation Acknowledgment CLEC _____ BST _____ Date / / (35)

Request Appeal Yes No (36)

Appeal Considerations (37)

Attachment A-1



Change Request Form

Agreed Release Date ___/___/___ (38)	CMVC # _____ (39)
	DDTS# _____ (40)

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.



Change Request Form

BST Response to CR0040

Last update 8-7-00

(BST response to questions from originator sent on 7-24-00)

- 1) Provide a history report (*Need the reports to be more real time*) from LEO/LNPGW that indicates the progress of an LSR through the electronic systems. Provide the following information as applicable:

Tracking must start from the receipt of the LSR at the BellSouth end of the interface (EDI, TAG, or LENS). The start and stop points below are all at LEO or the LNP Gateway reflecting either when it received or sent a transaction. This proposal fails to provide the ability to identify the fact that an LSR becomes stuck between the interface and LSRR/LEO/LNP.

8-7-00 A complete history status will be made available that will track the progress of an LSR through the electronic systems. An updated LEO history will be available every hour. The LNPGW data will be available daily for statuses from the previous day. The reports will provide the following information:

- a) Receipt in LEO from EDI (or other electronic interface) or receipt in the LNP Gateway (LNPGW) from LEO (LSRR). *This description indicates that all LSRs go to LEO and that the LSRR is in LEO rather than between the interfaces and LEO and LNP. Please clarify.*

8-7-00 Receipt from CLEC interface to the LSRR (LSR Router)

8-7-00 Receipt in LEO or in the LNP Gateway (LNPGW) from LSRR

- b) Receipt in LESOG from LEO or receipt in LAUTO from LNPGW
- c) Detail information regarding any fallout for manual handling
- i) The system in which the LSR fell out for manual handling
 - ii) Reason for fallout
 - iii) **The time of the fallout (added 8-7-00)**
 - iv) Time manual fallout is claimed by a service representative
 - v) Time manual fallout is resolved by service representative
- d) Service order issuance time in SOCS
- e) Response from LESOG to LEO or LAUTO to LNPGW *I assume we are discussing rejects, FOCs, jeopardizes and completions in this and the next item. Time Stamps.*
- 8-7-00 response from LESOG to LEO or LAUTO to LNPGW including timestamps (such as rejects, FOCs, jeopardies and completions)**
- f) **8-7-00 Response from receiving interfaces to the CLEC interfaces with timestamp**

Attachment A-4A



Change Request Form

Include a standard set of queries/reports run against the data daily, immediately after it was posted to find and identify "stuck" orders/responses. They should then also have procedures to clear the stuck item.

8-7-00 Items should not become "stuck" unless we are experiencing system outages or anomalies. BellSouth is immediately aware of such situations and provides information to CLECs of such problems, as quickly as possible, via email messages and Web posting by the Electronic Communications Support (ECS) group.

- 2) Provide a way for the LCSC to correct an LSR in the LNP Gateway if it has been clarified in error, without the CLEC having to submit a SUP.
(CR 19708 has already been issued and is currently targeted for 1Q01.)
- 3) The CLEC will need to call the LCSC when an LSR is thought to have been clarified in error so that a service representative can take immediate action to resolve the error and process the request.
- 4) Significant work was done with OSS99 to enhance error messages to make them much more user friendly. BellSouth is willing to continue to work with CLEC, through the CCP process, to make further improvements. The CLEC will need to identify unclear clarification reasons so that BellSouth can re-word them in a clearer manner. This will eliminate an unnecessary step for the CLEC and allow both BellSouth and the CLEC to be more productive.

8-7-00 NOTE REGARDING LNP:

Currently the LNP architecture is not designed to accommodate real time queries regarding the status of a service order and the location of an LSR with respect to the hand-off between systems. We are currently making architecture changes to the LNP system, which in time may allow a real time query to occur. CLECs can track their orders by viewing the electronic acknowledgements, Firm Order Confirmations/Rejects/Clarifications, Pending Order Status and completion notices sent back upon receipt and processing to help facilitate making porting activity successful.

Attachment A-4A

Exhibit JMB-31

April 25, 2001, Prioritization Final Ranking
Tally



**CHANGE REVIEW PRIORITIZATION
FINAL RANKING TALLY
4/25/2001**

CATEGORY / INTERFACE	CHANGE REQUEST	TITLE	RANKING*
PRE-ORDERING / ORDERING	CR0040	ORDER TRACKING REQUEST	1
	EDI0812990004	CHANGE MAIN ACCOUNT NUMBER	2
	EDI0812990005	HANDLING OF REMAINING SERVICE	3
	CR0135	MERGING OF ACCOUNTS	4
	CR0096	ADD ABILITY TO CREATE NEW LISTINGS IN LENS	5
	CR0145	CAPABILITY TO REMOVE A TN FROM A LENS LSR	6
	CR0020	VIEW MULTIPLE CSRs SIMULTANEOUSLY	7
	CR0215	UNE TO UNE BULK MIGRATIONS	8
	TAG0812990001	PROVIDE CFA VIA PRE-ORDER	9
	CR0029	PARTIAL MIGRATION OF UNE LOOPS (REQTYP A)	10
	CR0038	TOS FIELD ON REQTY J	11
	CR0241	CN RETURNED ON INCORRECT LSR VERSION	12
	CR0137	FLOW THROUGH FOR REQTY CB, ACT P & Q ALLOW CHANGES IN DIRECTORY DELIVERIES (LENS)	13
	CR0196	EXTENDED LOOPS (EELS) MECHANIZATION	14
	CR0078	DEFAULT THE LISTED TN	15
	CR0146	RPON FLOW THROUGH & ELECTRONIC REJECT	16
	CR0003	LISTING ACT ONLY / REQTY J & ACT = R LENS INQUIRY - VIEW CSR - USE 3-DIGIT CUST CODE IN VALIDATION	17
	CR0351	ADD LSR CODES IN LENS	18
	CR0113	IMPLEMENT INTERACTIVE AGENT - EDI	19
	CR0144	WEB-BASED LSR	20
	CR0186	FLOW THROUGH FOR REQTY BB, ACT P & Q	21
	CR0085	CIC FIELD	22
	CR0160	LIFT CURRENT RESTRICTIONS OF THE LEAN/LEATN FIELDS	23
	CR0336		24
	EDI0812990007		25

*NOTE: FORCED RANKING FROM 1 - "N" (DEPENDING ON NUMBER OF REQUESTS PER CATEGORY) WITH "N" BEING THE HIGHEST RANKED.

	CR0101	EDI PRE-ORDERING SOLUTION	26
	CR0104	LENS LARGE ACCOUNT INQUIRY - PRE-ORDER ABILITY TO ACCESS TNs BEHIND SLAs	27
	CR0016	SERVICE INQUIRY ENHANCEMENTS FOR SLT, SL2, DS0, DS1 & ISDN PRE-ORDERING	28
	CR0178	PROVIDE SOLICITED NOTIFICATIONS IN TAG	29
	CR0221	ALLOW USER TO POPULATE LQTY IN LENS PRE- ORDER	30
	CR0127	ALERT END USER THAT A CSR IS PENDING A SVC ORDER	31
	CR0273	ABILITY TO ORDER RCF THROUGH LENS	32
	CR0179	TAG NAVIGATOR TO CORBA BRIDGE ROUTER	33
	CR0176	ALLOW PIC & LPIC TO BE SUBMITTED AS "NO CHANGE" FOR LNA OF V	34
	CR0181	ADD GRID VALUES FOR DISCONNECT # FIELD IN TAG	35
	CR0088	MECH OF UNBUNDLED NETWORK TERMINATING WIRE (UNTW)	36
DOCUMENTATION	CR0314	ENHANCE TAG API DOCUMENTATION - NOTIFICATIONS	1
	CR0139	BETTER RELATE THE TAG API GUIDE TO THE PRE- ORDER BUSINESS RULES	2
	CR0315	ENHANCE TAG API DOCUMENTATION - ADD DATA LENGTH AND VALIDATION / USAGE RULES	3
	CR0180	API REFERENCE GUIDE RECOMMENDATIONS FOR CLEC NOTIFICATION SERVER & LISTENER	4
MANUAL	CR0284	LNP RANGE OF TELEPHONE NUMBERS	1
	CR0352	DFDT - ALL ENTRIES IN MILITARY FORMAT	2
	CR0344	ADD ACT OF T & V TO EELS	3

*NOTE: FORCED RANKING FROM 1 - "N" (DEPENDING ON NUMBER OF REQUESTS PER CATEGORY) WITH "N" BEING THE HIGHEST RANKED.

Exhibit JMB-32

Change Request CR0416, The Ability to
View Pending Disconnect Orders



Change Request Form

To be completed by BCCM only:

(1) CHANGE REQUEST LOG # CR0416	
(2) STATUS	N
(3) STATUS	
DATE SENT (2a):	05-29-01

To be completed by CCM or BellSouth:

(3) REQUEST TYPE	<input type="checkbox"/> TYPE 2 (REGULATORY)	<input type="checkbox"/> TYPE 3 (INDUSTRY)	<input type="checkbox"/> TYPE 4 (BST)	<input checked="" type="checkbox"/> TYPE 5 (CLEC)
	<input type="checkbox"/> TYPE 6 (DEFECT) NOTE: COMPLETE SECTION 2	<input type="checkbox"/> EXPEDITED FEATURE	<input type="checkbox"/> FLOW-THRU	

SECTION 1

(4) COMPANY NAME	NuVox Communication
(5) OCN	
(6) CCM NAME	Gloria Melvin
(7) TELEPHONE NUMBER	770 225 5154
(8) CCM EMAIL ADDRESS	gmelvin@nuvox.com
(9) CCM FAX NUMBER	770 392-1127
(10) ALTERNATE CCM NAME	Sherian Lively
(11) ALTERNATE PHONE NUMBER	770 225-5157
(12) ORIGINATOR'S NAME	Gloria Melvin
(13) ORIGINATOR'S PHONE NUMBER	770 225 5154
(14) TITLE OF CHANGE REQUEST	The Ability to View Pending Disconnect Orders

(15) CATEGORY	<input checked="" type="checkbox"/> ADD NEW FUNCTIONLITY	<input type="checkbox"/> CHANGE EXISTING
----------------------	--	--

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.



Change Request Form

(16) DESIRED DUE DATE		ASAP		
(17) ORIGINATING CCM ASSESSMENT OF IMPACT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW	
(18) ORIGINATING CCM ASSESSMENT OF PRIORITY	<input type="checkbox"/> URGENT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW
(19) INTERFACES IMPACTED				
PRE-ORDERING	<input type="checkbox"/> LENS	<input type="checkbox"/> TAG	<input type="checkbox"/> CSOTS	
ORDERING	<input checked="" type="checkbox"/> EDI	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input checked="" type="checkbox"/> LNP
MAINTENANCE	<input type="checkbox"/> TAFI	<input type="checkbox"/> EC-TA Local		
MANUAL	<input checked="" type="checkbox"/> Manual			
(20) TYPE OF CHANGE (Check one or more, as applicable)				
<input type="checkbox"/> Software	<input type="checkbox"/> Product & Services	<input type="checkbox"/> Documentation	<input type="checkbox"/> Hardware	<input type="checkbox"/> New or Revised Edits
<input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards	<input checked="" type="checkbox"/> Process	<input type="checkbox"/> Other	<input type="checkbox"/> Defect
<input type="checkbox"/> Expedited Feature	<input checked="" type="checkbox"/> Flow Through			
(21) DESCRIPTION OF REQUESTED CHANGE (Including purpose and benefit received from this change. Include attachments if available)	The Ability to View Bell South's Pending Disconnect Orders when porting. This would help to prevent double billing.			
(22) REQ TYP(s) IMPACTED:	C			
(23) ACT TYP(s) IMPACTED:	D			
(24) PROVIDE EXAMPLE OF REQUESTED CHANGE:	Need to be able to view Disconnect Orders in Lens a few days after porting to make sure D order is done with same Due Date as the Porting Date.			
(25) Identify the L30G versions that are affected by this change				
<i>This section to be completed by BellSouth only:</i>				
(26) Does this request require clarification?	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
(27) Clarification Request Sent				
(28) Clarification Response Due				

Attachment A-1

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.



Change Request Form

(29) Change Request Review Date	
(30) Target Implementation Date	
(31) Change Review Meeting Results	

(32) CANCELED CHANGE REQUEST DUPLICATE TRAINING CLARIFICATION NOT RECEIVED

(33) CANCELLATION ACKNOWLEDGMENT CLEC BST DATE:

(34) APPEAL YES NO

(35) APPEAL CONSIDERATIONS

SECTION 2

This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request

(36) PON #

(37) ERROR MESSAGE:

(38) RELEASE OR API VERSION (If applicable)

(39) DESCRIPTION OF DEFECT SCENARIO:

SECTION 3

This section to be completed by BellSouth - Internal Validation of Defect Change Request

(40) DEFECT VALIDATION RESULTS:

(41) CLARIFICATION NEEDED: YES NO

(42) VALIDATED DEFECT IMPACT LEVEL: HIGH MEDIUM LOW

(43) VALIDATION TYPE: DEFECT FEATURE TRAINING ISSUE DUPLICATE

(44) DEFECT IMPACTS OTHER CLEGS? YES NO

(45) INTERFACES IMPACTED BY DEFECT: EDI TAG LNP LENS
 TCIF 7 TCIF 9

(46) TARGET IMPLEMENTATION DATE:

Attachment A-1

Exhibit JMB-33

Hearing Transcript FPSC Docket No.
000731-TP

1 provide the specific line class code and put it on each
2 customer's order, is justified by the FCC's order that it
3 issued when it rejected BellSouth's second Louisiana 271
4 application, right?

5 A Yes. What the FCC said was if an ALEC has a
6 single routing plan for all its customers, which you could
7 read to mean all its customers in BellSouth's nine-state
8 region, then BellSouth should be able to figure out AT&T's
9 choice. And we agree. If they only have one choice and
10 AT&T says for all of my customers send it to any one of
11 these options, any one of those options, we will know what
12 to do. It's only where it becomes situational that we
13 don't know what to do and we need input from AT&T.

14 Q Well, the FCC also said that BellSouth should
15 not require the competitive LEC to provide the actual line
16 class code if BellSouth is capable of accepting a single
17 code region-wide, right?

18 A That's right. But that's back to the same -
19 back to the same logic, I think. Yes, we don't - and, in
20 fact, we don't ask you to put a line class code
21 designation on your order if we know what your choice is.
22 For example, in Atlanta, Georgia in BellSouth's Peachtree
23 Place central office, AT&T and BellSouth have worked
24 together, since we preprogram those line class codes, you
25 pass us an order that has got that single choice on it,

1 you don't have to specify a line class code and the order
2 flows-through well.

3 Q So the real nub here is that we disagree on what
4 the FCC meant in this order, right?

5 A Apparently so.

6 Q And BellSouth is capable of accepting a single
7 code region-wide to route to AT&T's operator service
8 platform, right?

9 A Yes.

10 Q Not a line class code, but an indicator?

11 A Well, yes. And in a fashion we are doing that
12 with what we have done for AT&T in BellSouth's Peachtree
13 Place central office. What we did was build logic into
14 part of the ordering system that told BellSouth based on
15 the class of service, the given central office, and the
16 blocking features that came across on AT&T's order, we
17 built those line class codes in a system called LESOG,
18 L-E-S-O-G.

19 That system looks in its tables and says, okay,
20 given that combination of class of service, blocking
21 levels, and the central office involved, this is the right
22 line class code to use. So that's what we are doing. And
23 we are in conformance with the FCC's requirement that we
24 take a single indicator. Your single indicator is you
25 have told us what your default plan is, and where you

Exhibit JMB-34

Selective Call Routing Using Line Class
Codes

CLEC Information Package

May 17, 2001

(Version 1)

Selective Call Routing Using Line Class Codes

**CLEC
Information Package**

May 17, 2001

(Version 1)

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Introduction and Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the service described herein.

Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

Selective Call Routing Using Line Class Codes

Revisions

This is the initial version of this service's Information Guide.

Selective Call Routing Using Line Class Codes

Product Name

Selective Call Routing Using Line Class Codes

Service Description

BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature provides Unbranded and/or Custom Branded Operator Services provided by BellSouth operators to Competitive Local Exchange Companies (CLECs) reselling BellSouth telecommunications services (Reseller) or utilizing unbundled local switching (UNE Port CLEC). Custom Branding provides definable announcements to the CLEC's end users prior to placing them in queue or connecting them to an available operator or Automated Operator System. The BellSouth provided Unbranded option does not identify a specific company brand name when connecting the end user to an operator.

Selective Call Routing using Line Class Codes (SCR-LCC) provides the capability for a CLEC to have its OS/DA calls routed to BellSouth's OS/DA platform for BellSouth provided Custom Branded or Unbranded OS/DA or to its own or an alternate OS/DA platform for Self-Branded OS/DA. SCR-LCC is only available if line class code capacity is available in the requested BellSouth end office switches.

Where available, CLEC-specific and unique line class codes are programmed in each BellSouth end office switch where the CLEC intends to serve end users with customized OS/DA branding. The line class codes specifically identify the CLEC's end users so OS/DA calls can be routed over the appropriate trunk group to the requested OS/DA platform. Additional line class codes are required in each end office if the end office serves multiple NPAs (i.e., a unique LCC is required per NPA), and/or if the end office switch serves multiple rate areas and the CLEC intends to provide CLEC-branded OS/DA to its end users in these multiple rate areas.

CLEC dedicated trunking is required and must be ordered from each end office to the BellSouth TOPs tandem for Custom Branded OS/DA and to the appropriate point of interface for Self-Branded OS/DA. BellSouth will provide the trunking on shared trunk groups for Unbranded OS/DA.

In addition to supporting selective routing for customized OS/DA branding, line class codes are also utilized to provision end user specific call blocking/restrictions, optional dialing plans, measured versus flat rate pricing plans and multi-line hunting in 5E switches. Therefore, the CLEC-specific line class codes must be programmed to include the handling of these services as well as specific OS/DA branding. The SCR-LCC ordering forms will prompt the CLEC to choose if such other services will be needed and allow such services to be listed on the service request.

When utilizing SCR-LCC to establish an OS/DA branding option, the CLEC may select one of two types of OS/DA Branding Defaults. The Branding Default applies when no specific OS/DA branding instructions are provided on the Local Service Request (LSR). The CLEC may select the Standard OS/DA Branding Default, which is BellSouth, or it may select a Customized Branding

Selective Call Routing Using Line Class Codes

Default. Specific instructions and requirements concerning the Branding Default are explained further in this guide.

Pre-Ordering

Availability

The availability of this service is dependent on the specific terms of the contract between BellSouth and the CLEC. Furthermore, this service is offered on a first come, first serve basis and is dependent on the availability of Line Class Codes in the requested BellSouth switch.

Pre-Ordering Applications (included within this guide)

1. CLEC Selective Routing Service Inquiry
2. CLEC Selective Routing Ordering Document
3. Selective Routing End Office Detail Information

CLEC Selective Routing Service Inquiry

The CLEC notifies BellSouth of its intent to order SCR-LCC for OS/DA Branding by submitting the CLEC Selective Routing Service Inquiry form. On this form, the CLEC must include its desired due date, contact information, form issuance date, CLLI codes of the BellSouth end offices where it desires SCR, the NPA that will be affected by SCR and the number of Line Class Codes desired for that CLLI/NPA combination. If the CLEC desires multiple NPAs in a CLLI to be affected by SCR, each CLLI/NPA combination will need to be listed on an individual line and unique Line Class Codes for such combinations will be necessary.

The number of Line Class Codes to be listed on this form will be determined by the completion of the CLEC Selective Routing Ordering Document.

CLEC Selective Routing Ordering Document

This form must be completed and submitted to the CLEC's Account Team along with the CLEC Selective Routing Service Inquiry. This form must be provided for each BellSouth end office where the CLEC desires SCR-LCC. In addition to the CLEC's contact information, end office CLLI code and state, the following fields must be completed:

1. **Option** – This field identifies the call blocking/restriction (CREX) option desired for the Line Class Code. Each option requires its own unique Line Class Code. Refer to the tables on page 3 for the possible Option choices. If a CREX option is not requested to apply with specific OS/DA branding and therefore unique Line Class Codes are not established, that CREX option shall not be able to be ordered with CLEC-specific OS/DA Branding.
2. **NPA** – This field identifies the desired NPA to be affected by SCR-LCC. Each NPA per CLLI requires its own line on this form or unique Line Class Code.

Selective Call Routing Using Line Class Codes

3. **Line Class** – This field identifies the Line Class of Service that will be affected by SCR-LCC. Refer to page 4 for possible selections. POTS should be selected for Residential and Business unbundled ports, port/loop switched combinations and UNE-P.
4. **ODP (Optional Dialing Plan) (Y/N)** – BellSouth provisioned optional dialing plans require unique Line Class Codes. If the CLEC desires SCR-LCC for UNE port or Resale USOCs that include optional dialing plans, then “Yes” should be listed in this field. Furthermore, “No” should be listed if the CLEC desires SCR-LCC to affect only basic dialing plans.
5. **Flat/Meas (Flat or Measured Service)** – This field identifies whether the service is flat rated or measured rated, as separate Line Class Codes are required for each. Unbundled ports, switched port/loop combinations and UNE-P are measured services. Resale, however, may be a measured or flat service. For example, Resellers desiring SCR-LCC on a resold 1FR must request flat rated Line Class Codes. Additionally, measured Line Class Codes may be used for measured Resale services and unbundled ports, switched port/loop combinations and UNE-P.
6. **MLH Hunt (Multi-line Hunting) (Y/N)** – Multi-line Hunting requires unique Line Class Codes in 5E switches. If Multi-line Hunting is desired select “Yes” and if it is not select “No”. If both options are desired, then separate lines will need to be completed. If the applicable BellSouth switch is not a 5E, then completing this field is not necessary.
7. **0- Brand 1/2/3/4** – This field allows the CLEC to select the level of 0- branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
8. **DA Brand 1/2/3/4** - This field allows the CLEC to select the level of DA branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
9. **0+ Local Brand 1/2/3/4** - This field allows the CLEC to select the level of 0+ Local branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded. 0+ intralata toll calls and 0+ interlata toll calls shall be routed to the end user's LPIC'd and PIC'd carriers respectively.
10. **611 Customized Routing** – This field allows the CLEC to select SCR to its own platform for its end user dialed 611 calls. For BellSouth retail end users in Georgia, Florida, North Carolina and South Carolina, 611 is BellSouth's repair line. This capability is only offered in these states and applies only to Self Branding OS/DA. Select “Yes” if 611 SCR is desired and “No” if it is not.
11. **Default Branding** - The Standard Default Branding for SCR-LCC is BellSouth Branding if no branding is identified on the CLEC's Local Service Request (LSR). However, the CLEC may choose to have Customized Default Branding. This allows a CLEC to select a single specific OS/DA branding option by class of service and such arrangement shall be provided as the default, meaning that such branding shall be provided without specific

Selective Call Routing Using Line Class Codes

instructions placed in the LSR. Customized Default Branding requires BellSouth to program its ordering systems and will take three to six months to develop for each request.

Within this field, list either BellSouth or Customized for each Line Class of service. For POTS, the branding option may be divided between residence and business and should be listed accordingly (e.g. Residence – BellSouth).

Each line completed on the CLEC Selective Routing Ordering Document, results in a unique Line Class Code. The sum of the Line Class Codes for each CLLI should be populated accordingly on the CLEC Selective Routing Service Inquiry.

Upon submitting these two forms to the BellSouth Account Team, BellSouth will determine if the quantity of requested Line Class Codes are available in the requested BellSouth end office switches. If they are and if the CLEC is establishing Custom Branded or Self Branded OS/DA, at this point the CLEC must order dedicated OS/DA trunking with MOSS signaling from the applicable BellSouth end offices to the appropriate BellSouth or alternate service provider OS/DA platforms. This must be complete before the Line Class Codes are built in the BellSouth end office switches, as they must be directed to specific trunk groups and tested.

Selective Routing End Office Detail Information Form

If dedicated trunking is required and once it has been established, the Selective Routing End Office Detail Information Form must be completed and submitted to the Account Team. Each Two-Six code for 0-, 0+ Local, DA and 611 for each CLLI/NPA combination must be listed on this form. This provides the information necessary for BellSouth to direct the appropriate Lines Class Codes to the appropriate trunk groups.

Once the Line Class Codes have been established, BellSouth will provide to the CLEC the Selective Routing Codes used in each CLLI for each option by returning the CLEC Selective Routing Ordering Document.

Ordering Information

BellSouth Default Branding

When choosing Standard BellSouth Default Branding (i.e. BellSouth OS/DA branding is applied when no OS/DA branding instructions are placed on the LSR), specific information is required on the LSR in order to receive the desired OS/DA Branding when ordering. The CLEC must float the ZSRC FID behind the **Line Class of Service USOC** followed by the **Selective Routing Code** in the feature detail field. Again, the **Selective Routing Codes** will be provided by the BellSouth Account Team during the provisioning of this service.

CREX codes for specific call blocking and restrictions should not be placed on the LSR with this option as such desired functionalities shall be accommodated by the Selective Routing Code. If a

Selective Call Routing Using Line Class Codes

CREX code was not requested as an option when requesting an Selective Routing Code, it may not be ordered to apply to an OS/DA branding option. Such requests will be rejected.

Customized Default Branding

When choosing Customized Default Branding, no specific OS/DA branding instructions are required on the LSR when ordering, and the CLEC desired OS/DA branding shall be applied to the end user's service. With this option the CLEC must place CREX codes that have corresponding Selective Routing Codes on the LSR in order for BellSouth to determine which Selective Routing Codes to automatically apply to the end user's line. If a CREX code is ordered and a corresponding Selective Routing Code has not been established by the CLEC, the order shall be rejected.

Billing Information

- The CLEC must provide BellSouth with a Facility-based OCN and have requested a facilities based Q-account number through its Account team before ordering this service.
- Current BellSouth Billing Account establishment rules require an OS/DA Branding option for each Master Q Account. This service, however, is defined to provide the CLEC the functionality to select multiple branding options within the Master Q Account (but no lower than the Earning Account), as multiple types of service may apply to that single Master Q Account. Therefore, until system changes can be completed, the bill phrase as well as the branding information on the CSR shall reflect the branding option residing on the Master Q Account. The CLEC should refer to the Selective Routing Codes on the CSR to identify the exact type of branding.

Pricing

The specific charges for this service are listed in the Interconnection Agreement between the Parties. There is a nonrecurring charge for the establishment of each Line Class Code in each BellSouth central office. Furthermore, for Unbranded and Custom Branded OS/DA provided by BellSouth Operator Services with unbundled ports, unbundled port/loop switch combinations and UNE-P, monthly recurring usage charges shall apply for the UNEs necessary to provide the service, such as end office and tandem switching and common transport. A flat rated end office switching charge shall apply to Self-Branded OS/DA when used in conjunction with unbundled ports, unbundled port/loop switch combinations and UNE-P.

BellSouth

CLEC Selective Routing Ordering Document

Customer Name										(Area Code) Telephone Number			(Area Code) Fax Number		
Account Exec. Name										(Area Code) Telephone Number			(Area Code) Fax Number		
CLLI							State				Office Type				
BST USE ONLY			CLEC USE ONLY												
SRC	LCC Used	LTG	Option	NPA	Line Class	ODP (Y/N)	Flat/ Meas	MLH Hunt (Y/N)	0- Brand 1/2/3/4	DA Brand 1/2/3/4	0+ Local Brand 1/2/3/4	611 (Repair) (Y/N)	Branding Default (BST/Customized)		
1															
2															
3															
4															
5															
6															
7															
8															
9															
10															
11															
12															
13															
14															
15															
16															
17															
18															
19															
20															
<p>Note 1. Service Levels 1-BST Brand 2- No Brand 3- Custom Brand 4- Self Brand Note 2. SCR code is 5 digit code assigned by LCCAM. LCC Used is 3 digit LCC Input by CTG. The LCC is the last 3 digits of the SRC. Note 3. ODP plans are not available with flat rate service. Note 4. 611 is only available in Georgia, Florida, North Carolina, and South Carolina.</p>															

Comments/

Selective Routing End Office Detail Information

	Office CLLI	NPA RAC	TS Code 0-	BST Use TGN	TS Code 0+ Local	BST Use TGN	TS Code DIR ASST	BST Use TGN	TS Code 611	BST Use TGN
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										

Notes/Comments

BELLSOUTH

Customized Calling Restrictions (CREX)

Table 1

Non-Centrex Like Services

OPTIONS	BLOCKS
UNR	No Blocking (Unrestricted)
1	1+, 0+, 0-, 00, 01+, 011+, 411, 1411, Pulselink, 976, 900, N11
2	0-, 0+, 00, 01+, 976, Pulselink
3	1+, 0-, 0+, 00, 01+, 011+, 900
4	900, 976
5	976
6	900, 976, N11
7	011, 1010XXX+011
A	Same as CREX 1, but also blocks mandatory ext calling plans
B	Same as CREX 2, but also blocks mandatory ext calling plans
W	0-, 0+, 00, 01+, 011+, 976
X	900, 976, 011+
Y	900, 976, N11, 011+
Z	976, 011+
SRG	1+, 1010XXX 1+, 900, 976 (Sends ANI 07)
SRGBX	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC) PBX
SRGCO	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC Only)

Notes:

- Options 1 through SRGCO cannot be combined.
- If 0- or 0+ is custom routed, then option 1, 2, 3, A, B, or W cannot be selected.
- If Dir ASST is Custom Routed then option 1 or A cannot be selected.
- SRG requires ANI 07 in 1AESS switches.

Table 2

Centrex Like Services

OPTIONS	Blocks
UNR	No Blocking (Unrestricted)
Deny Orig.	Blocks Originating Calls
Deny Term.	Blocks Terminating Calls
1	900, 976
2	011+
3	N11
4	411
5	Toll 1+, 011+, 900, 976
6	ELCA and Toll 1+, 011, 900, 976
SRGPL/SRG	1+, 1010XXX 1+, 900, 976
Station Rest 1	1AESS Only- Fully Restricted Incoming and Outgoing
Station Rest 2	1AESS Only- Fully Restricted Incoming
Station Rest 3	1AESS Only- Fully Restricted Outgoing
Station Rest 4	1AESS Only- Semi Restricted Incoming and Outgoing
Station Rest 5	1AESS Only- Semi Restricted Incoming
Station Rest 6	1AESS Only- Semi Restricted Outgoing

Notes:

- Deny Originating cannot have option 1 through SRG/SRGPL.
- Option 5 cannot be combined with Option 1, 2, 6, or SRG/SRGPL.
- Option 6 cannot be combined with Option 1, 2, 5, or SRG/SRGPL.
- 1AESS Station Restriction 1, 3, 4, or 6 cannot have Option 1 thru SRG/SRGPL.
- If Dir Asst is Custom Routed, Then Option 4 cannot be selected.
- SRG/SRGPL cannot be combined with Option 1 through 6.

LINE CLASS

LINE CLASS	DESCRIPTION
POTS	Plain Old Telephone Service
COIN	Coin Lines
HOTL	Hotel/Motel
PBX	Private Branch Exchange
ISDN	Integrated Services Directory Number
WATS	Wide Access Telephone Service
PSTG	Prestige
CENTREX	Centrex Like Service

Note: Only one Line Class can be selected per CLEC LCC.

Exhibit JMB-35

Florida OSS Test Exception 69

EXCEPTION 69
BellSouth Florida OSS Testing Evaluation

Date: June 12, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature. (TVV1)

Background:

BellSouth's OS/DA Branding feature enables Competitive Local Exchange Companies (CLECs) to select Unbranded and/or Custom Branded Operator Services provided by BellSouth operators. Custom Branding identifies a CLEC-defined company name to the CLEC's end users, prior to being placed in queue, or prior to being connected to applicable operator services. The Unbranded option does not identify a specific company name when connecting a CLEC end user to an operator.

USOCs are codes used to identify features, and their associated tariffs, in a service request. BellSouth business rules specify, "The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field."¹

KPMG Consulting submitted a Selective Routing Service Inquiry form to the BellSouth Account Manager, and obtained Line Class of Service Codes and Selective Routing Codes to be used in association with the OS/DA service request as outlined in BellSouth's business rules.

Issue:

The instructions for identifying the Line Class of Service USOC on the Local Service Request (LSR) are incomplete. BellSouth does not provide feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules.²

¹ See *Selective Call Routing Using Line Class Codes CLEC Information Package*, Version 1, May 17, 2001, page 8. This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/products/html/unes.html>

² See *BellSouth Business Rules for Local Ordering - OSS99, Issue 9N May 31, 2001*, pages 1567 & 1568.

This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

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Without a feature code for an OS/DA feature, KPMG Consulting was unable to process the service requests, using any electronic interface. Service requests for OS/DA are rejected by BellSouth's front-end edits when the appropriate code on the feature code field of the Resale Service (RS) form is not specified.

Furthermore, the instructions on how to populate the feature detail field do not clearly indicate whether the ZSRC Field Identifier precedes the Line Class of Service USOC or not.

Impact:

BellSouth's incomplete instructions relating to USOCs for the OS/DA feature may impact a CLEC in the following ways:

- **Decrease in Customer Satisfaction.** A misidentification of a CLEC's operator assistance service might negatively impact a customer's view of a CLEC's service quality.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution might increase the effort CLEC resources must expend before successfully processing individual OS/DA service requests.